

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

Joshua Winer,

Plaintiff,

v.

Umaymah Mohammad, AJP Educational Foundation, Inc. A/K/A American Muslims For Palestine, WESPAC Foundation, Inc., Sean Eren as the representative of National Students for Justice in Palestine, Doctors Against Genocide Society, Cair-Nga Inc. A/K/A/ CAIR-Georgia, CAIR Foundation Inc., A/K/A Council on Islamic Relations or CAIR, Rupa Marya, Ibrahim Jouja as representative of Emory Students for Justice in Palestine,

Defendants.

Civil Action Case No.  
1:25-cv-02329-TWT

**SECOND AMENDED COMPLAINT FOR DAMAGES AND JURY  
DEMAND**

Joshua Winer (“**Plaintiff**”) by and through his undersigned counsel in collaboration with the National Jewish Advocacy Center, Inc., hereby files this Second Amended Complaint and alleges the following against Defendants Umaymah Mohammad (“**Mohammad**”), AJP Educational Foundation, Inc. A/K/A American Muslims For Palestine (“**AMP**”), WESPAC Foundation, Inc.

(**WESPAC**), Sean Eren as the representative of National Students for Justice in Palestine (“**NSJP**”), Doctors Against Genocide Society (“**DAG**”), Rupa Marya (“**Marya**”), Cair-Nga Inc. A/K/A/ CAIR-Georgia (“**CAIR-Georgia**”), CAIR Foundation Inc., A/K/A Council on Islamic Relations or CAIR (“**CAIR-Foundation**”) and Ibrahim Jouja as representative of Emory Students for Justice in Palestine (“**Emory SJP**”), (collectively, the “**Defendants**”).

## INTRODUCTION

1. Mohammad, a Palestinian medical student at Emory University School of Medicine (the “**School of Medicine**”), made false statements about Plaintiff, a Jewish American-Israeli physician and professor at the School of Medicine, which were defamatory per se and placed Plaintiff in a false light.

2. Mohammad maliciously and falsely stated that Plaintiff directly participated in and aided and abetted a genocide in Gaza by virtue of his service in the Israeli Defense Forces (“**IDF**”). She further asserted that as a result of his actions in the IDF, Plaintiff is unfit to teach medical students or provide medical care to patients.

3. Mohammad initially made these statements about Plaintiff during a segment on Democracy Now!, a daily news program broadcast widely online, on television, and on radio. Thereafter, Mohammad reiterated the same false statements and further elaborated upon them on a podcast, in an op-ed that she authored for an

online publication, at a press conference, and in an interview with a daily newspaper reporter. Mohammad's false statements were subsequently printed in various news outlets, online publications, and on various social media accounts.

4. Upon information and belief, Mohammad was suspended from the School of Medicine for one year, beginning on or about November 19, 2024, due to her statements about Plaintiff in her interview on Democracy Now! (the "**Democracy Now Interview**"), which were determined to be in violation of the Emory University School of Medicine's Conduct Code (the "**Conduct Code**").

5. Defendants NSJP, DAG, Marya, CAIR Georgia, CAIR-Foundation, and Emory SJP published, adopted, reiterated and expanded upon Mohammad's false statements about Plaintiff in an apparent effort to both support Mohammad by pressuring the School of Medicine to reinstate her, and to terminate Plaintiff's employment.

6. Defendants NSJP, DAG, Marya, CAIR Georgia, CAIR-Foundation, and Emory SJP each individually worked with Mohammad to provide her with a platform to adopt, further amplify and disseminate her false statements about Plaintiff. By doing so, NSJP, DAG, Marya, CAIR Georgia, CAIR-Foundation, and Emory SJP each individually defamed Plaintiff, placed him in a false light, and engaged in a civil conspiracy with Mohammad to further publicize Mohammad's defamatory statements about Plaintiff and place Plaintiff in a false light.

7. The false and inflammatory statements at issue in this action are not protected under the First Amendment. Rather, they constitute defamation per se and were made with malice to portray Plaintiff in a false light. As a direct and proximate result of the widespread dissemination of these false statements, Plaintiff has suffered significant, ongoing and enduring public embarrassment, emotional distress, and harm to his professional reputation.

8. The animus alleged in this case is not mere disagreement with Israeli policies. It is personal, racial, and aimed squarely at Plaintiff's identity as a Zionist Jew—someone who, in the wake of the October 7 attacks targeting Jews, chose to serve in the military of the world's only Jewish state in defense of his ancestral homeland.

9. This action also arises under 42 U.S.C. § 1985(3) for civil conspiracy to deprive Plaintiff of his rights and privileges as a citizen of the United States. Mohammad conspired with the other defendants to target Plaintiff because of his race, ethnicity, and his affiliation with both Israel and the IDF—an institution closely tied to Jewish national identity. Through a coordinated campaign of knowingly false and defamatory statements, Mohammad and her co-conspirators sought to intimidate Plaintiff and suppress his rights to the equal protection of the laws and of equal privileges and immunities under the laws.

10. By falsely asserting that Plaintiff, by virtue of serving in the IDF, was



guilty of “genocide” and “war crimes,” and thus unfit to teach medical students and train residents, Defendants targeted Plaintiff not based on his individual conduct, but on *who he is and what he represents*. The nature of the accusations—automatically equating Jewish self-defense or military service with crimes against humanity—is emblematic of modern-day antisemitic tropes, condemned by international authorities and civil rights watchdogs.<sup>1</sup> Defendants’ actions sought to vilify Plaintiff on the basis of his race, ethnicity, national origin, and association with the IDF, and to intimidate him into silence. This class-based animus against Jewish individuals is precisely the kind of invidious discrimination § 1985(3) was designed to address.

11. Rather than merely expressing a disagreement with Plaintiff’s views or background, or even doing any basic inquiring into the nature of his service and his actions, Mohammad and her co-conspirators undertook a coordinated effort to stigmatize, isolate, and eliminate Plaintiff from his professional and academic life. This included publicizing knowingly false statements about Plaintiff with the intent of damaging his reputation and career, and encouraging others to adopt, echo and amplify these claims in protest letters, student petitions, and social media campaigns — all for the purpose of coercing institutional censure or dismissal. Such conduct was not protected speech, but a coordinated effort to suppress Plaintiff’s protected

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<sup>1</sup> See e.g., *Working definition of antisemitism*, Int’l Holocaust Remembrance All., <https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antisemitism> (last visited May 11, 2025).

rights.

## **PARTIES**

12. Plaintiff is a Jewish resident of Atlanta, Georgia with dual American and Israeli citizenship. He is a board-certified surgical oncologist at Emory Winship Cancer Institute, a professor in the Department of Surgery, Division of Surgical Oncology, at the School of Medicine, and serves as the Surgical Clerkship Director at the School of Medicine. On information and belief, Emory is a recipient of federal grants, making it a “program or activity receiving Federal financial assistance” for purposes of Title VI of the Civil Rights Act, 42 U.S.C. § 2000d. Plaintiff is deeply committed to the care of his patients and education of his students, and he strongly believes that saving lives is his calling. His role as a surgical oncologist and a professor is integral to his identity. Following the Hamas-led terror attacks in Israel on October 7, 2023 (the “**October 7 attacks**”), Plaintiff felt a religious, moral, and national responsibility to protect the Jewish people and the State of Israel, the Jewish homeland. He took a leave of absence to volunteer in one of the IDF’s elite reconnaissance units. In that role, he was deployed to Gaza in his capacity as a physician to provide medical care to wounded soldiers.

13. Mohammad, a resident of Georgia, describes herself as an organizer for the Palestine Liberation Movement.<sup>2</sup> She is an anti-Israel organizer that has repeatedly publicly praised terrorism against Israel and expressed her hatred towards the United States and Israel. On information and belief, Mohammad is a co-founder and active member of DAG, a steering committee member of NSJP, and an active member of Emory SJP. Mohammad is also an MD/PhD candidate at the School of Medicine and the Sociology Department at Emory University (“**Emory**”). Mohammad was suspended by the School of Medicine for a period of one year because the statements that she made about Plaintiff were found to be in violation of its Conduct Code.

14. Defendant AMP is a 501(c)(3) non-profit corporation incorporated in California with its principal place of business in Falls Church, Virginia. AMP is the founder of NSJP and upon information and belief, maintains organizational management and control of NSJP, including the social media messaging of hundreds of college chapters across the country. On information and belief, AMP and NSJP share a social media manager, and AMP maintains a formal liaison role with NSJP to ensure that its messaging is disseminated uniformly across college SJP chapters nationwide. In November 2023, AMP’s annual conference included a “Youth

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<sup>2</sup> Doctors Against Genocide, “Cultivating Courage”, January 14, 2025, YouTube, [https://www.youtube.com/watch?v=\\_02nyIGfjzc](https://www.youtube.com/watch?v=_02nyIGfjzc) (last visited April 24, 2025).

Program” featuring an “SJP Workshop,” as well as a “Campus Activism Track” specifically designed to strengthen coordination and solidarity among SJP chapters.

15. WESPAC, which is an abbreviation for Westchester People’s Action Coalition Foundation, is a New York-based 501(c)(3) nonprofit corporation and has served as the fiscal sponsor for NSJP since at least 2016. NSJP does not itself hold tax-exempt status, and WESPAC receives tax-deductible donations and grants on NSJP’s behalf. Pursuant to IRS guidelines governing fiscal sponsorship, WESPAC is required to maintain full control and discretion over the use of donated funds and is legally responsible for ensuring that all disbursed funds are used exclusively for legitimate charitable purposes. Accordingly, WESPAC bears direct responsibility for overseeing and approving the activities and expenditures of NSJP that are funded through this fiscal sponsorship arrangement.

16. NSJP is an unincorporated association without a formal principal place of business, but operates as AMP’s college campus brand, while WESPAC funds the operation. WESPAC knowingly collects donations for the operation, while AMP and NSJP carry out the execution of it. In 2023, NSJP established a centralized structure to exert more control over individual SJP chapters.<sup>3</sup> Upon information and belief, NSJP is represented by Sean Eren, a steering committee member. According

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<sup>3</sup> You Cannot Profit Off Our People’s Blood and Think Students Will Not Come For Your Money, HAMMER & HOPE (Spring 2024), <https://hammerandhope.org/article/palestine-college-students> (last visited September 11, 2025).

to its official website, NSJP identifies itself as part of an anti-West movement: “Supporting over 350 Palestine solidarity organizations across occupied Turtle Island (so-called North America), we aim to develop a student movement **connected, disciplined, and equipped** with the tools necessary to pursue **Palestinian liberation** on our campuses (emphasis in original).” NSJP is an anti-Zionist movement that aims to ensure that “students will continue to resist Zionism on campus” and that the “world understands the Zionist entity as a fundamentally expansionist, colonial, and genocidal project.” NSJP promotes baseless convoluted conspiracy theories alleging that the U.S. government, in coordination with Zionist organizations, the Israeli government, and university board members, are engaged in coordinated efforts to censor, suspend, and deport students who speak out in support of Palestine. They have also been accused of providing material support to terrorist organizations.

17. DAG is a 501(c)(3) non-profit corporation incorporated in Michigan whose stated mission is to oppose genocide, but has been widely criticized by media outlets and watchdog groups for promoting anti-Israel and anti-Zionist rhetoric. DAG regularly engages in antisemitic Holocaust inversion by comparing Israeli military actions in response to the Hamas led October 7 attacks to those of Nazi Germany. In December 2023, DAG planned an anti-Israel protest at the U.S. Holocaust Memorial Museum. Upon information and belief, Mohammad and Marya

are both founders of DAG and are significantly involved with the organization. Both Mohammad and Marya recently presented as DAG panelists and hosted DAG webinars.

18. Marya, a resident of California, is a professor of medicine at the University of California, San Francisco (UCSF). Upon information and belief, UCSF placed Marya on indefinite leave after she questioned its admission of an Israeli first-year medical student on the basis that he may have served in the IDF, and implored the university to investigate whether this student had participated in genocide. According to Marya's statements on her social media account, she is at risk of having her medical license revoked because of her "activism". Marya has used her social media platform to openly call for the dissolution of the State of Israel, assert that the presence of Zionism in US medicine is a structural impediment to health equity, draw inflammatory comparisons between Zionists and Nazis, characterize the October 7 attacks as a justified form of resistance, and falsely assert that Jewish hostages held captive by Hamas are actually grateful to their Hamas captors for their "care".

19. CAIR Georgia is a registered 501(c)(3) nonprofit organization registered in Georgia that describes itself on its website as a "Muslim advocacy organization." CAIR Georgia has publicly expressed the view that Israel is a colonialist occupier of Palestinian territory in Gaza, notwithstanding the fact that

Israel unilaterally withdrew from Gaza in 2005 and that Hamas, which currently governs Gaza and is designated as a terrorist organization by the United States government, was elected by the residents of Gaza in 2006. CAIR Georgia has also repeatedly referred to Israel as an “apartheid state,” despite the fact that Israel’s substantial Arab population and non-Jewish population holds full citizenship and have equal civil rights under Israeli law.

20. CAIR-Foundation is a 501(c)(3) organization registered in Washington D.C. While the group’s stated mission is to “enhance understanding of Islam, protect civil rights, promote justice, and empower American Muslims,” the group lobbies on national, state and chapter levels for various anti-Israel initiatives. CAIR-Foundation is a recipient of federal grants, making it a “program or activity receiving Federal financial assistance” for purposes of Title VI of the Civil Rights Act, 42 U.S.C. § 2000d. The group has fought against the Anti-Semitism Awareness Act, promoted the Boycott, Divestment and Sanctions (BDS) movement, and regularly attempts to diminish American support for Israel. Some of CAIR’s leaders, such as Nihad Awad, CAIR-Foundation’s executive director, previously led the Islamic Association for Palestine (IAP), a now-defunct organization that openly supported Hamas and, according to the U.S. government, functioned as its “propaganda apparatus.” The FBI has refused to work with CAIR since it was an unindicted co-conspirator in the largest material support for terror case in US history, and when

CAIR publicly expressed support for the October 7<sup>th</sup> attacks, the White House also stopped working with them.

21. Emory SJP is a chapter of NSJP that is active at Emory University. Upon information and belief, Ibrahim Jouja was the president of Emory SJP at the time that it defamed Plaintiff.

### **JURISDICTION AND VENUE**

22. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331.

23. This Court also has supplemental jurisdiction over Plaintiff's related state-law claims pursuant to 28 U.S.C. § 1367.

24. This Court has personal jurisdiction over those defendants domiciled in the State of Georgia. As to the remaining defendants, personal jurisdiction is proper because they expressly directed their tortious conduct toward Plaintiff in Georgia and should have reasonably anticipated that the effects of their actions would be felt in this State.

25. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 because this is the judicial district in which a substantial amount of the events giving rise to Plaintiff's claims occurred.

### **FACTUAL ALLEGATIONS**

#### **1. Background**



**A. Mohammad Accused Emory and the School of Medicine of Being Complicit in Palestinian Genocide**

26. On or about January 17, 2024, while Mohammad was a PhD candidate in the Sociology Department at Emory and a medical student at the School of Medicine, she sent an email spanning approximately seven pages to the entire student body and faculty of the School of Medicine, including Plaintiff. The subject line of the email read: “Palestinian Blood Stains Your Hands, Emory University and School of Medicine” (Exhibit A). This email will be referred to hereafter as the “SOM Email”.

27. In the SOM Email, Mohammad praised terrorism against Israel, expressed her hatred towards Israel and the United States, and stated that Israel, the United States, and Emory are perpetrating a genocide against Palestinians in Gaza. The content of the email was laden with misinformation and closely mirrored the propaganda typically propagated by Hamas, a United States designated Foreign Terrorist Organization. Mohammad’s political views about Israel and the United States were the basis of the false and inflammatory statements she would later make regarding the Plaintiff when she discovered that he served in the IDF. These views are consistent with those expressed in her academic writing, in which she asserts that “Zionist Judaism” and “the Zionist Judaic project in Palestine” are “being used to justify the ethnic cleaning of the Palestinians and the illegal acquisition of their lands

in order to replace Palestine with the settler colonial project of apartheid Israel.” (See Exhibit C at 2).

28. In reality, approximately 2 million Arabs are citizens of Israel and comprise about 21% of the population. Many of these Arabs are Palestinian, being descendants of those who remained in the territory after the establishment of Israel in 1948. In addition to Palestinians, this population also includes other groups such as Druze, Bedouins, and Circassians, each with their own distinct cultural and historical identities. Claims of apartheid are nonsensical because Arab Israeli citizens enjoy full and equal civil rights, including representation in the Knesset (the Israeli House of Representatives), and contribute to Israeli society as doctors, lawyers, and judges. Mohammad’s accusations of Israel’s engagement in ethnic cleansing is similarly false because the Arab population in Israel, including Judea and Samaria (also known as the West Bank), has grown annually since the establishment of the State of Israel.

29. Mohammad also completely mischaracterizes Zionism, which in its essence, is the belief in the right of the Jewish people to self-determination in their ancestral homeland. Jews are indigenous to the land of Israel, with a historical and religious connection that dates back over 3,000 years, predating Palestinian presence in the region. The term “Jew” is derived from “Judea,” the ancient name for the land

of Israel. The Jewish connection to Israel is indisputable and forms a part of the bedrock of Jewish identity for the vast majority of Jews.<sup>4</sup>

30. Plaintiff was distraught when he received the SOM email, which was rife with verifiably false information about Israel as well as political rhetoric with which he vehemently disagreed. He was further angered by the fact that a student had exploited the School of Medicine's listserv to disseminate false information and political propaganda. Nonetheless, Plaintiff did not file a complaint with the School of Medicine's administration because he recognized that Mohammad's statements might be protected under the First Amendment and that the administration would act if it found that Mohammad had violated any applicable rules and policies.

31. Mohammad misused the School of Medicine's listserv to distribute the SOM Email to the entire faculty and student body in furtherance of her personal political agenda. Despite the inflammatory content of the email and her improper use of institutional resources, there is no indication that Mohammad was suspended or otherwise disciplined in response to this incident. To date, no disciplinary action related to the SOM Email has been publicly disclosed.

#### **B. The Times of Israel Published Plaintiff's Op-Ed Regarding Plaintiff's Service in the IDF**

32. Nearly two months later, on or about March 7, 2024, the *Times of Israel*,

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<sup>4</sup> See e.g., Pew Research Center, *Jewish Americans in 2020*, at 57–60 (May 11, 2021), <https://www.pewresearch.org/dataset/jewish-americans-in-2020/> (last visited May 13, 2025).

an Israeli news outlet, published an op-ed written by the Plaintiff titled, “An Ongoing Quest to Serve”.<sup>5</sup> In the piece, Plaintiff shared his decision to travel to Israel to volunteer as a physician following the October 7 attacks, during which Hamas and other Palestinian terrorists infiltrated Israel’s borders, violated a cease-fire agreement, murdered over 1200 people, kidnapped over 250 people, and publicly vowed to repeat these atrocities at the next available opportunity.

33. Although he had lived in the United States for over twenty years since initially leaving to serve in the IDF, Plaintiff explained in his op-ed that he felt a deep sense of duty to return to Israel and rejoin the IDF in order to support the country in its time of need.

34. Plaintiff shared that he initially volunteered with Magen David Adom (Israel's national emergency medical, disaster, ambulance and blood bank service) and was subsequently drafted as a surgeon into one of the IDF’s elite reconnaissance units, where he served in Gaza.

35. In his reflection on his service, Plaintiff highlighted the profound and far-reaching impact of the October 7 attacks on Jewish communities worldwide, emphasizing that the effects of the attacks transcend borders and have irrevocably altered Jews’ sense of security outside of Israel. He stressed the vital importance of

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<sup>5</sup> Joshua Winer, *An Ongoing Quest to Serve*, March 7, 2024, <https://blogs.timesofisrael.com/an-ongoing-quest-to-serve/> (last visited April 24, 2025).

Israel's existence for the survival of the Jewish people, asserting that even from abroad, the influence of the State of Israel is profoundly felt.

**C. Mohammad Made False Statements About Plaintiff in an Interview Conducted by Democracy Now!**

36. Nearly two months later, on or about April 26, 2024, Mohammad participated in an interview with reporter Amy Goodman for the independent news program, *Democracy Now!*, which is broadcast on over 1,500 television and radio stations and has over 2.5 million subscribers on YouTube. During the Democracy Now Interview, Ms. Goodman referenced Mohammad's SOM Email and asked Mohammad to discuss the significant number of Palestinians, including doctors and nurses, who had been killed in Gaza. Additionally, Ms. Goodman asked Mohammad to discuss why this issue was of particular concern to her. In response, Mohammad stated:

“... one of the professors of medicine we have at Emory recently went to serve as a volunteer medic in the Israeli Offense Force [sic] and recently came back. **This man participated in aiding and abetting a genocide, in aiding and abetting the destruction of the healthcare system in Gaza and the murder of over 400 healthcare workers, and is now back at Emory so-called teaching medical students and residents how to take care of patients.** I mean, the disconnect is, for me, very obvious. And it's very frustrating that the School of Medicine and the greater Emory community continues to ignore these major disconnects.”<sup>6</sup> (emphasis added).

37. Mohammad stated that Plaintiff aided and abetted a genocide of

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<sup>6</sup> *Democracy Now! Daily Show*, Democracy Now!, April 26, 2024, [https://www.democracynow.org/2024/4/26/emory\\_protests](https://www.democracynow.org/2024/4/26/emory_protests) (last visited April 24, 2025).

Palestinian people in Gaza despite the fact that he had clearly done no such thing. Plaintiff served in the IDF exclusively in his capacity as a physician-medic and engaged in *defensive* combat solely in the event that his unit was directly attacked.

38. Mohammad also attributed responsibility to Plaintiff for “participating in the destruction of Gaza’s healthcare system and murdering its healthcare providers” without any acknowledgment of the fact that hospitals lose protection under the Geneva Convention once they are used as military bases and facilities to hold hostages captive<sup>7</sup> and, of course, despite the fact that *Plaintiff himself had done no such thing*.

39. Lastly, Mohammad stated that it was not feasible for Plaintiff to return from participating in a genocide and subsequently teach medical students and residents how to properly care for patients despite the fact that Plaintiff had actually returned from serving as a physician who cared for injured soldiers in the IDF.

40. When Ms. Goodman questioned why Mohammad referred to the Israeli

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<sup>7</sup> See Articles 18 and 19, Geneva Convention Relative to the Protection of Civilian Persons in Times of War (Fourth Geneva Convention), (August 12, 1949), 75 U.N.T.S. 287, <https://ihl-databases.icrc.org/en/ihl-treaties/gciv-1949?activeTab=undefined>; Articles 12 and 13, Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I), (June 8, 1977), <https://ihl-databases.icrc.org/en/ihl-treaties/api-1977?activeTab=undefined>; Customary IHL Rule 28, ICRC Database (Last Visited September 11, 2025) (discussing treaty provisions and state practice relating to protection and loss of protection for medical facilities), <https://ihl-databases.icrc.org/en/customary-ihl/v1/rule28>. See also Michael N. Schmitt, Israel-Hamas 2023 Legal Symposium, The Legal Protection of Hospitals During Armed Conflict, Articles of War December 29, 2023), <https://lieber.westpoint.edu/legal-protection-hospitals-during-armed-conflict/>.

Defense Forces as the Israeli Occupation Force, Mohammad replied: "...we reject the idea that the Israeli Offense Force is defending anything legitimate. The Israeli Offense Force has always been on the offensive, effectively enacting ethnic cleansing against the Palestinians, effectively stealing land, creating illegal settlements, checkpoints, creating conditions that are highly unlivable for Palestinians. And that's why we use the language 'Israeli Offense Force,' not the IDF."

41. In reality, Israel is a legitimate sovereign state and the Israel-Gaza war began when Gaza's terrorist government illegally infiltrated Israel's borders and committed the worst atrocities against Jewish people since the Holocaust. The Israeli government has repeatedly stated that it will end the war as soon as Hamas returns Israel's hostages and lays down its arms.

42. Plaintiff did not participate in genocide, the destruction of Gaza's healthcare system or the murder of over 400 healthcare workers at any time during his IDF service.

**D. Mohammad Underwent Disciplinary Investigation and Was Suspended by the School of Medicine**

43. On or about June 18, 2024, Mohammad received a letter from Dr. J. William Eley, the Executive Associate Dean of Medical Education and Student Affairs at Emory, notifying her of allegations that she violated the Conduct Code. Dr. Eley explained that the allegations related to her Democracy Now Interview and

requested a meeting with Mohammad to discuss the matter.

44. Upon information and belief, more than one complaint was actually made to Dr. Eley from faculty members regarding concerns that Mohammad had violated the Conduct Code during her Democracy Now Interview.

45. On or about July 8, 2024, Dr. Eley received an investigative report from Dr. Monica Farley, a physician employed by the School of Medicine, who had been tasked with determining whether Mohammad should be formally charged for violating the Conduct Code as a result of her statements during the Democracy Now Interview. Dr. Farley recommended that formal charges be brought against Mohammad in accordance with the Conduct Code. Dr. Farley's report (Exhibit B) stated:

The use of inflammatory language (stating that the man participated in aiding and abetting genocide, in aiding and abetting the destruction of the healthcare system in Gaza and the murder of over 400 hundred healthcare workers) directed at an individual faculty member is irresponsible, disrespectful, causes a reasonable apprehension of harm, and exposes the faculty member to public hatred and harassment, all of which appears to be in violation of the Emory Professional Conduct and the Code of Conduct expectations. Although the faculty member was not named in the interview, it is reasonable to expect him to be identified based on the details Ms. Mohammad provided in the interview along with widespread social media information sharing.

46. In a letter dated July 12, 2024 from Dr. Eley to Mohammad, Dr. Eley conveyed his support for Dr. Farley's recommendation to formally charge Mohammad with multiple violations of the Conduct Code.

47. Upon information and belief, during a meeting between Dr. Eley and



Mohammad to discuss the investigative report, Mohammad asserted that she had not explicitly identified the Plaintiff by name in her Democracy Now Interview. Additionally, Mohammad attempted to argue that if the Plaintiff's identity was discernible from her comments during the Democracy Now Interview, then it was the Plaintiff's own fault, as he had published an op-ed in the *Times of Israel* discussing his service in the IDF.

48. However, Plaintiff's op-ed did not contain any of the false inflammatory statements at issue. Furthermore, upon information and belief, Mohammad only became aware of the Plaintiff's service in the IDF through his op-ed in the *Times of Israel*. As such, Mohammad knew that any viewer of her Democracy Now Interview, upon hearing her remarks about a professor from the School of Medicine who had served in the IDF, could easily ascertain the identity of Plaintiff through a simple internet search. The op-ed was publicly available and easily accessible.<sup>8</sup> Moreover, there is no other professor in the School of Medicine that served in the IDF following the October 7 attacks. Therefore, Mohammad's claim that she did not identify the Plaintiff is without merit.

49. On or about November 19, 2024, a hearing was conducted by an ad hoc conduct committee to address the charges against Mohammad. Mohammad has

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<sup>8</sup> As of April 8, 2025, Plaintiff's op-ed, which identifies him by name, is the seventh search result for the query: "Who is the Emory professor that served in the IDF?"

publicly stated that she was issued a one-year suspension on the date of the hearing.

## **2. Mohammad Continued to Make False Statements About Plaintiff**

### **A. Mohammad Made False Statements About Plaintiff on a Podcast**

50. On or about November 4, 2024, while Mohammad was still undergoing the disciplinary proceeding process overseen by Dr. Eley, she participated in a panel discussion on a podcast hosted by the International Union of Scientists.<sup>9</sup> The podcast episode was titled, “International Student Movements Against Genocide in Palestine.” During this podcast episode, Mohammad made the following statements:

At Emory University and other institutions here in the US, there are physicians who have served in the IDF and in fact, a physician at Emory has actually volunteered to serve in both a medical and military capacity in this last year in the genocide. And these physicians returned to teach medical students and see patients ... our institutions are literally employing people who are not just complicit in these genocides, but ... their hands are directly participating in the taking of life ... this simple individual example is a reflection of a system that chooses which lives to save with one hand and which lives to take with the other ... I again just [want] to reiterate in a different way [that] it is truly our professional duty as scientists and physicians and healthcare workers to dismantle the structures that are taking life on such a massive scale, like the State of Israel, like the IDF, like the U.S. Empire.”<sup>10</sup>

51. Thus, Mohammad both reiterated the same false statements she previously made about Plaintiff, while also making additional false statements

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<sup>9</sup> *International Student Movements Against Genocide in Palestine*, International Union of Scientists (November 4, 2024), <https://www.youtube.com/watch?v=CJyeyABYREU> (last visited April 24, 2025).

<sup>10</sup>As stated, except for removal of filler words.

concerning Plaintiff.

52. First, Mohammad stated that Plaintiff served in both a medical and military capacity, implying that Plaintiff was a regular combat soldier. In reality, as even Mohammad had acknowledged in her Democracy Now Interview, Plaintiff served in the military in his medical capacity following the October 7 attacks. As previously discussed, Plaintiff was engaged in defensive combat solely in the event that his unit was directly attacked and otherwise served in the IDF exclusively in his capacity as a physician.

53. Second, Mohammad falsely asserted that Plaintiff was not only complicit in the IDF's actions against Palestinians, but that he directly engaged in taking Palestinian lives as part of a genocide.

54. Lastly, Mohammad falsely stated that Plaintiff and other physicians who served in the IDF and later returned to work in the U.S. healthcare system were violating their professional duties by "taking life".

**B. Mohammad Made False Statements About Plaintiff in an Op-Ed Published by *Mondoweiss***

55. On or about January 21, 2025, *Mondoweiss*, an independent online publication that focuses on news and analysis related to the Israeli-Palestinian conflict, published an op-ed written by Mohammad titled, "I was suspended from Emory over my Palestine activism. I will not let it stop me."

56. Mohammad used her op-ed to once again make false statements

regarding Plaintiff:

... Amy Goodman asked about my previous comments on Emory School of Medicine’s complicity in the genocide in Gaza. I gave the example of our surgery clerkship director who participated in Israel’s war crimes by serving in the IDF in early 2024 and was allowed to return to his teaching position at the institution. What kind of care are patients receiving from doctors who believe in the legitimacy of apartheid, and that some human lives are not as important as others? These physicians are creating a world in which only some people—those who look like them—deserve care and protection ... The medical school administration at Emory suspended me on November 19th, 2024, citing violations of “respect” and “professionalism” due to my interview on Democracy Now!. I brought attention to an Emory physician-faculty’s aiding and abetting a genocide and the destruction of the healthcare system in Gaza. They have attempted to silence my advocacy to end the genocide and U.S. healthcare’s complicity in structural violence. But they have failed to scare or silence me.<sup>11</sup>

57. While Plaintiff was already identifiable after Mohammad referred to him as an Emory physician and professor who served in the IDF and returned to teach and practice medicine, she further increased his identifiability in her op-ed by specifically describing him as the surgery clerkship director at the School of Medicine.

58. In addition, Mohammad used her op-ed to make a new false statement about Plaintiff, asserting that he supports apartheid and believes that only those who resemble him deserve care and protection.

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<sup>11</sup> Umaymah Mohammad, *I was suspended from Emory over my Palestine activism. I will not let it stop me*, January 21, 2025, Mondoweiss, <https://mondoweiss.net/2025/01/i-was-suspended-from-emory-over-my-palestine-activism-i-will-not-let-it-stop-me/> (last visited April 24, 2025).

59. The false and defamatory apartheid claim is separate from the false and defamatory genocide claim, has no basis in reality, and is based solely on Plaintiff's identity as a Jewish Israeli. As Mohammad explains in her academic writing, it is her belief that "Zionist Judaism manifest density [sic] is being used to justify the ethnic cleaning of the Palestinians and the illegal acquisition of their lands in order to replace Palestine with the settler colonial project of apartheid Israel." See Exhibit C at 2.

60. At the conclusion of Mohammad's op-ed in *Mondoweiss*, she provided a link to "a community led effort" that had been launched to support her. The link was to the First NSJP and DAG Post, which directed readers to follow another hyperlink to a campaign on the Action Network website, which contained additional false statements about Plaintiff and identified him by name, discussed *infra* in detail. In short, the Action Network campaign demanded Mohammad's reinstatement and that Plaintiff be investigated and/or terminated due to this participation in "a genocide".

**C. Mohammad Made False Statements About Plaintiff at a Press Conference Held by CAIR Georgia**

61. On February 11, 2025, CAIR Georgia held a press conference (the "**Press Conference**") to call on Emory and the School of Medicine to reinstate and drop the charges against Mohammad.

62. During CAIR Georgia's press conference, Mohammad delivered a pre-

written speech in which she made the following statements:

...I have been suspended for a year from medical school after being subjected to a six-month unjust conduct process. They disciplined me for exposing Emory's complicity in the destruction of Gaza in an interview where I mentioned an unnamed physician who served in the military, actively engaged in the genocidal campaign against the Palestinian people, my people ... Having a physician faculty member who participated in a military convicted of committing genocide against Palestinians makes me feel unsafe. It makes black and brown medical students feel unsafe. It makes black and brown and indigenous patients feel unsafe. I cannot learn from a physician who might have fired one of the 355 bullets that landed in 6 year old Hind Rajab's body. Or who might have helped make the decision to bomb one of the hospitals in Gaza. Or who might have celebrated the murder of our communities on the rubble still wet with Palestinian blood. A doctor who cannot see Palestinians as human beings will return to Atlanta to offer the same disposability to black and brown patients at home (hereinafter referred to as the "**CAIR Speech**").

63. Mohammad once again falsely stated that Plaintiff's participation in the commission of genocide made him unfit to teach or treat others in a professional capacity.

64. Mohammad also falsely asserted that Black and Brown students were not safe in Plaintiff's presence and that Plaintiff could not be trusted to provide medical care to Black and Brown patients because he viewed them as disposable.

65. Furthermore, Mohammad falsely stated that Plaintiff "participated in a military convicted of committing genocide...". However, the IDF has not been convicted of a genocide by any court in any jurisdiction. Furthermore, contrary to widespread media coverage that misinterpreted the International Criminal Court of Justice's (ICJ) ruling on the matter, the ICJ did not find that the claim of genocide

was even plausible. Rather, the ICJ merely decided that South Africa had standing to bring an action against Israel alleging genocide in Gaza and that Palestinians had “plausible rights to protection from genocide” notwithstanding the fact that Gaza is not a recognized nation state.

66. Plaintiff served in the Israel Defense Forces (IDF) solely in his capacity as a physician, providing medical care to wounded soldiers. His involvement in combat was limited to situations in which his unit came under direct attack. Mohammad had no factual basis to claim that Plaintiff participated in or approved the bombing of hospitals in Gaza, celebrated the killing of Palestinians, regarded Palestinians as less than human, or would treat Black and Brown patients in Atlanta as disposable.

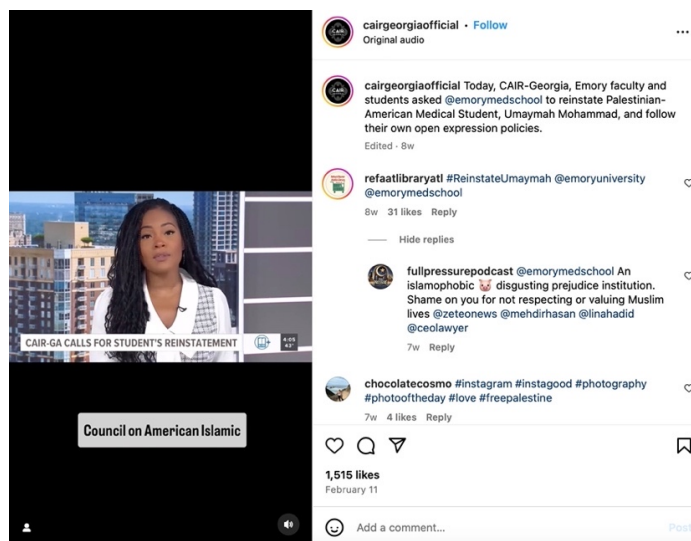
#### **D. Mohammad’s False Statements Were Publicized by News Outlets**

67. On or about February 11, 2025, WSB-TV aired a televised segment (the “**WSB-TV Segment**”) reporting on CAIR Georgia’s Press Conference. The segment included video footage of Mohammad at the Press Conference making false and inflammatory statements about Plaintiff. WSB-TV also published an article about the Press Conference on its website, which included the video segment and direct quotations of Mohammad’s false statements about Plaintiff. The article stated, in relevant part:

Mohammad was suspended for one year for violating the university’s code of conduct after providing an interview in April and alleging that an

unnamed Emory doctor was volunteering with the Israeli Army. In an interview still available on Democracy Now's YouTube Channel, Mohammad is seen and heard saying "This man participated in aiding and abetting a genocide, in aiding and abetting the destruction of the healthcare system in Gaza and the murder of over 400 healthcare workers."<sup>12</sup>

68. Also on or about February 11, 2025, NBC aired a separate segment covering the same Press Conference, during which footage was broadcast of Mohammad discussing her Democracy Now Interview and the false and inflammatory statements she made about Plaintiff at the time.



69. On or about February 12, 2025, the *Atlanta Community Press Collective* (“ACPC”) published an article regarding Mohammad’s suspension from the School

<sup>12</sup> WSBTV.com News Staff, *Emory student fights for class reinstatement after suspension for Israel-Gaza protests*, February 11, 2025, WSB-TV, <https://www.wsbtv.com/news/local/dekalb-county/emory-student-fights-class-reinstatement-after-suspension-israel-gaza-protests/BLCHKVHEBFCTNP52N7DGTYYJY2M/> (last visited April 24, 2025).



of Medicine (the “ACPC Article”).<sup>13</sup> The article included an interview with Mohammad and reiterated the false and inflammatory statements that Mohammad made about Plaintiff during her Democracy Now Interview, stating:

Mohammad interviewed with *Democracy Now!* on April 26, 2024, about the encampment and called out Emory faculty for enabling Israel’s genocide. During the interview, she referred to an IDF soldier-physician who works at Emory without naming him. She said that this individual “aided and abetted in a genocide, aided and abetted in the destruction of the healthcare system in Gaza, and in the murder of over 400 healthcare workers, and is now back at Emory, so-called teaching medical students and residents how to take care of patients.”

70. The ACPC Article then specifically identified Plaintiff by name and referenced his op-ed in the *Times of Israel*, making it evident to any reader that Mohammad was referring to Plaintiff. The article stated:

This soldier-physician, Dr. Joshua H. Winer, is an Associate Professor in the Division of Surgical Oncology, Department of Surgery at Emory University School of Medicine. Dr. Winer discussed his experience serving in the IDF in a *Times of Israel* article.

71. On or about February 13, 2025, Fox5 aired a televised segment that included footage of CAIR Georgia’s Press Conference and further publicized the false statements made about Plaintiff during her Democracy Now Interview.<sup>14</sup>

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<sup>13</sup> Timothy Pratt, *A Palestinian American medical student objected to working alongside IDF soldiers, the university suspended her*, The Guardian, March 24, 2025, <https://www.theguardian.com/us-news/2025/mar/24/emory-university-student-suspended-gaza-protest> (last visited April 24, 2025).

<sup>14</sup> CAIR-Georgia (@cairgeorgiaofficial), February 13, 2025, <https://www.instagram.com/p/DGBo9FavKDI/> (last visited April 2025).

72. On or about March 25, 2025, *The Guardian* published an article discussing Mohammad's suspension (the "**Guardian Article**"),<sup>15</sup> which included professional photographs of Mohammad that were taken for the piece and an interview that Mohammad gave *The Guardian*.



73. The Guardian Article referenced and republished additional false statements that Mohammad made about Plaintiff during her Democracy Now Interview:

... Mohammad told her Democracy Now! interviewer: "One of the professors of medicine we have at Emory recently went to serve as a volunteer medic" in the IDF. That professor, she continued, "participated in aiding and abetting a genocide, in aiding and abetting the destruction of the healthcare system in Gaza and the murder of over 400 healthcare workers, and is now back at Emory so-called 'teaching' medical students and residents how to take care of patients."

74. The Guardian Article discussed and reprinted the false statements

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<sup>15</sup> *Supra* note 13.

Mohammad made about Plaintiff in the *Mondoweiss* op-ed:

What kind of care are patients receiving from doctors who believe in the legitimacy of apartheid, and that some human lives are not as important as others?

75. The Guardian Article further reported that Dean Eley had presented Mohammad with a choice between challenging the findings of Dr. Farley's investigation or proceeding to a disciplinary hearing. Mohammad told *The Guardian* that she chose to proceed with the disciplinary hearing, stating: "[a]ccepting guilt would mean accepting not talking about Palestine and accepting not talking about genocide, and no career is worth that." This statement is significant as it reflects Mohammad's continued intent to make inflammatory statements about Plaintiff, despite being made aware that her statements were harmful to him.

76. Notably, Mohammad was suspended only after she falsely accused Plaintiff of participating in genocide and the destruction of Gaza's healthcare system. Her suspension was not the result of her misuse of the School of Medicine's listserv when she disseminated the SOM Email to the entire student body and faculty. Therefore, it stands to reason that Mohammad could have expressed her views on Palestine and the broader geopolitical conflict without incurring suspension. However, she chose instead to make knowingly false and highly inflammatory statements specifically targeting Plaintiff, with reckless disregard for the truth and with the intent to damage his professional reputation and career.

### 3. NSJP and DAG Published False Statements About Plaintiff

77. On or about January 13, 2025, NSJP and DAG, in collaboration with Atlanta Radical Art Collective, published a post on Instagram (the “**First NSJP DAG Post**”)<sup>16</sup> regarding a community-led initiative that was launched in response to Mohammad’s suspension from the School of Medicine.

78. This First NSJP DAG Post stated that Mohammad had been suspended from the School of Medicine due to her Democracy Now Interview during which she “alluded to an Emory physician who recently served in the Israeli Occupation Forces (IOF) [sic].” The post included the following direct quote from Mohammad’s Democracy Now Interview:

...one of the professors of medicine we have at Emory recently went to serve as a volunteer medic in the Israeli Offense Force and recently came back. This man participated in aiding and abetting a genocide, in aiding and abetting the destruction of the healthcare system in Gaza and the murder of over 400 healthcare workers, and is now back at Emory so-called teaching medical students and residents how to take care of patients. I mean, the disconnect is, for me, very obvious.

79. The post was widely disseminated on social media, receiving over 2,800 shares and more than 4,000 “likes” on Instagram alone.

80. In the comments section of the post, an Instagram user inquired about

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<sup>16</sup>National Students for Justice in Palestine (@nationalsjp) and Doctors Against Genocide (@doctorsagainstgenocide), Instagram (January 13, 2025), [https://www.instagram.com/p/DExgaxGOLao/?hl=en&img\\_index=1](https://www.instagram.com/p/DExgaxGOLao/?hl=en&img_index=1) (last visited (April 24, 2025)).

the identity of the professor referenced in the Democracy Now Interview. This inquiry was the second comment in response to the post, thus making it highly visible. In response, another user provided a link to the Plaintiff's op-ed in the *Times of Israel*. The original commenter then responded, thanking the user and explicitly and naming Plaintiff, Dr. Joshua Winer, as the individual referred to in the post in order to spare others from having to visit the link and read Plaintiff's op-ed.

81. Following the disclosure of Plaintiff's identity, additional users posted false and inflammatory statements targeting Plaintiff in the comments section of the post.

82. One such comment, addressed to the School of Medicine's official account, stated:

@emorymedschool ... How do you justify suspending a Palestinian medical student speaking out about GENOCIDE, while simultaneously condoning a professor of medicine who chooses to participate in that same genocide—one where healthcare workers are specifically targeted?

83. Another comment portrayed Plaintiff as a perpetrator of genocide and framed Mohammad as a resistor thereof, stating:

Shame on Emory for employing genociders [sic] and murderers, while punishing those who resist annihilation.

84. The First NSJP DAG Post called on readers to contact the deans of the School of Medicine to demand that the suspension charges against Mohammad be rescinded and that both Emory and the School of Medicine hold accountable those

students and faculty who have “participated in or legitimized the genocide in Gaza.”

85. True and correct copies of the relevant slides from the First NSJP DAG

Post are reproduced below for the Court’s reference.





**On April 26th, 2024, in a Democracy Now! interview titled “Atlanta Police Violently Arrest Emory Students & Faculty to Clear Gaza Solidarity Encampment,” Umaymah expressed concern over the silencing of Palestinian voices and alluded to an Emory physician who recently served in the IOF.**



**In response, Emory School of Medicine suspended her over violating the conduct principles of “professionalism” and “respect.”**

3/9



atiradicalart and 5 others

...



**atiradicalart ACTION ALERT: TAKE FIVE MINUTES TO SUPPORT SUSPENDED PALESTINIAN MD/PHD STUDENT, Umaymah MOHAMMAD! Take the two necessary actions: 1) Send an email to Emory administrators requesting they drop Umaymah's suspension and remove IDF soldiers from healthcare spaces and 2) Leave a message using the phone script for several Emory admin reiterating those demands.**

Umaymah was unjustly suspended from Emory University School of Medicine in November of 2024 for rightfully calling out a physician-faculty member who recently served in the IDF as “aiding and abetting in a genocide” in an interview on Democracy Now. Emory's own Office of Open Expression has found that this is a violation of Umaymah's rights as a student, and has ruled that the medical school is in violation of Emory policy. We join this national campaign to demand that Emory drop Umaymah's suspension, stop its racist targeting of Palestinian students and those in solidarity, and saying NO to IDF SOLDIERS IN HEALTHCARE! Join Umaymah and @doctorsagainstgenocide @healthcareworkersforpalestine @nationalsjp @palestineswg @msjp.national and @palestinianyouthmovement to protect Palestinian students fighting to end the genocide in Gaza and that targeting of healthcare workers and students.

9w



Liked by rupa.marya and 4,231 others

January 13



Add a comment...

Post

**In the interview, Umaymah states:**

“One of the professors of medicine we have at Emory went to serve in the Israeli Offense Force and recently came back. This man participated in aiding and abetting a genocide, in aiding and abetting the destruction of the healthcare system in Gaza and the murder of over 400 healthcare workers, and is now back at Emory so-called ‘teaching’ medical students and residents how to ‘take care’ of patients. I mean, the disconnect is, for me, very obvious.”

4/9



atiradicalart and 5 others

...



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9w



Liked by rupa.marya and 4,231 others

January 13



Add a comment...

Post

**The repression against Umaymah is not isolated. In October 2023, Emory also fired a Palestinian physician for her private social media posts in support of Palestinians.**

**What does it say about our medical and educational institutions when it is more punishable to resist genocide than to legitimize or even participate in one?**

**Rather than standing on the side of justice, the administration at Emory School of Medicine continues to side with white supremacy, genocide, and racial violence - participating in what Dr. Ghassan Abu-Sittah terms the "genocide enablement apparatus."**

atlradicalart and 5 others

**atlradicalart ACTION ALERT: TAKE FIVE MINUTES TO SUPPORT SUSPENDED PALESTINIAN MD/PHD STUDENT, Umaymah MOHAMMAD! Take the two necessary actions: 1) Send an email to Emory administrators requesting they drop Umaymah's suspension and remove IDF soldiers from healthcare spaces and 2) Leave a message using the phone script for several Emory admin reiterating those demands.**

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9w

♥️ 💬 🗑️

👤 Liked by rupa.marya and 4,231 others  
January 13

😊 Add a comment... Post

6/9

**WE DEMAND THAT:**

- 1 Dean Sandra Wong and Dean Bill Eley of Emory School of Medicine drop the suspension charges against MD/PhD candidate Umaymah Mohammad.**
- 2 Emory School of Medicine stop its targeting of medical students who are protesting and rejecting a genocide.**
- 3 Emory University and its School of Medicine take accountability for faculty and students who have participated in or legitimized the genocide in Gaza.**

atlradicalart and 5 others

**atlradicalart ACTION ALERT: TAKE FIVE MINUTES TO SUPPORT SUSPENDED PALESTINIAN MD/PHD STUDENT, Umaymah MOHAMMAD! Take the two necessary actions: 1) Send an email to Emory administrators requesting they drop Umaymah's suspension and remove IDF soldiers from healthcare spaces and 2) Leave a message using the phone script for several Emory admin reiterating those demands.**

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9w

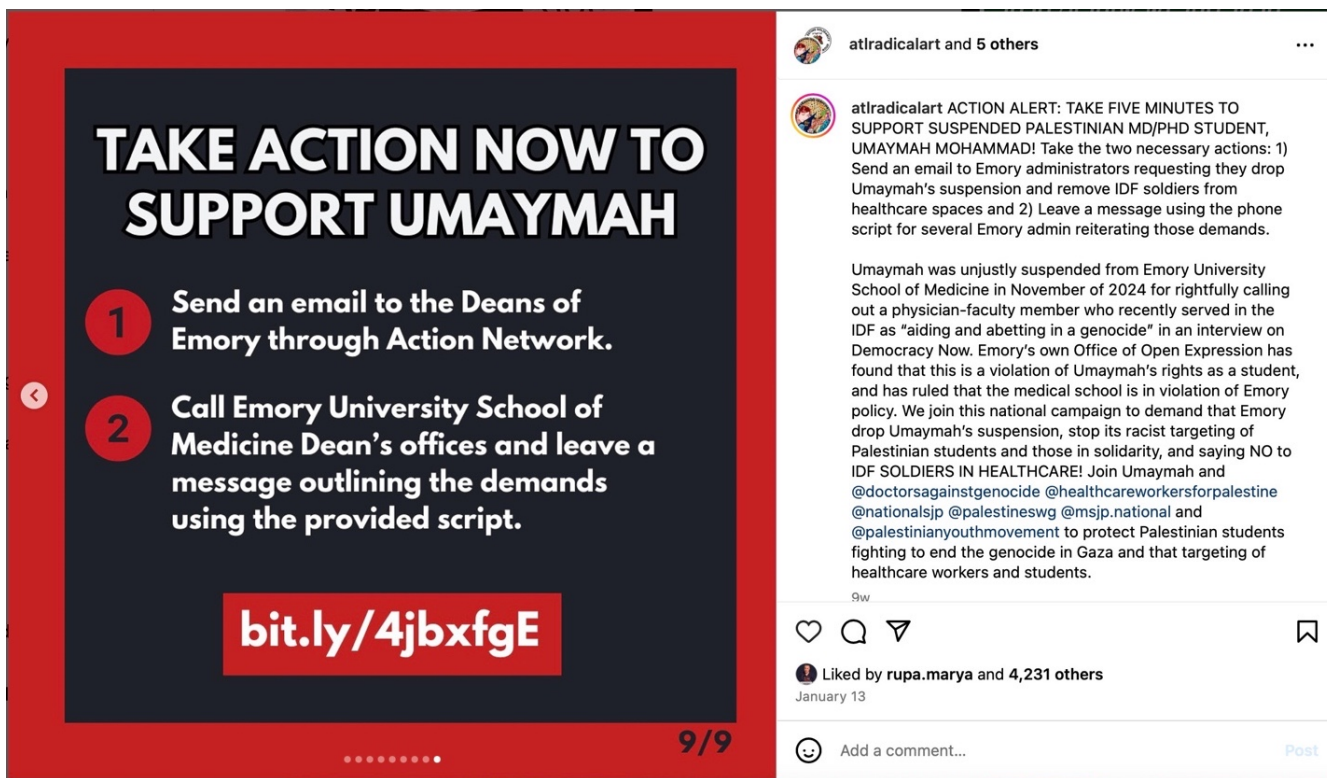
♥️ 💬 🗑️

👤 Liked by rupa.marya and 4,231 others  
January 13

😊 Add a comment... Post

8/9





86. The final slide of the First NSJP DAG Post contained a hyperlink to the Action Network campaign, which contained a pre-written email template (“**Email Template**”) and phone script (“**Phone Script**”). In the post, NSJP and DAG implored its supporters to use the Email Template and Phone Script to contact administrators at Emory University and the School of Medicine to demand the rescission of Mohammad’s suspension and investigate and/or terminate Plaintiff’s employment.<sup>17</sup>

87. The Email Template and Phone Script explicitly identified Plaintiff by

<sup>17</sup> Rupa Marya (@rupamarya), Instagram (January 14, 2025), [https://www.instagram.com/rupa.marya/p/DEzq7\\_cpDs\\_/palestinian-american-medical-student-umaymah-mohammad-spoke-the-unspeakable-and-/](https://www.instagram.com/rupa.marya/p/DEzq7_cpDs_/palestinian-american-medical-student-umaymah-mohammad-spoke-the-unspeakable-and-/) (last visited April 24, 2025).

name, repeated false and inflammatory allegations against him, and demanded that Emory and the School of Medicine investigate Plaintiff and/or terminate his employment. The following is a reproduction of the Phone Script:<sup>18</sup>

**CALL: (404) 712-9979**

Associate Dean of Medical Education and Student Affairs at Emory School of Medicine

Dr. Bill Eley

*[this is the dean who escalated the reports about me and essentially facilitated my suspension]*

**CALL: (404) 727-5631**

Dean of Emory School of Medicine

Dr. Sandra Wong

*[rejected Umaymah's appeal]*

**CALL: (404) 727-0018**

Office of the MD/PhD Program

Hello, my name is [Your Name], and I am a [community member/medical student/other identifier]. I'm calling to express my concern over the suspension of Umaymah Mohammad, a Palestinian MD/PhD student at Emory. This decision is part of a troubling pattern of anti-Muslim and anti-Palestinian actions at Emory, including the firing of Dr. Abeer AbouYabis.

Additionally, I'm alarmed by the institution's endorsement of faculty like Dr. Joshua Winer, who recently served in the Israeli Defense Forces. Is supporting genocide and war crimes more acceptable at Emory than resisting them? This erodes my trust in Emory as a safe and ethical place for students, faculty, and patients.

I call on Emory to:

1. Drop the suspension against Umaymah Mohammad without delay.

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<sup>18</sup> We Stand with Umaymah! IOF out of Healthcare!, Action Network, available at, <https://actionnetwork.org/letters/we-stand-with-umaymah-iof-out-of-healthcare?ref=iuscientists.org> (last visited April 24, 2025).

2. Investigate faculty and students endorsing Israel's apartheid regime and remove them for patient safety and compliance with international demands.
3. Publicly apologize for your shameful targeting of students and faculty alike who are using their voice to call for the end of the genocide in Gaza.

Failure to act will forever tarnish your institution's legacy. History will not forget your complicity in genocide.

The reference to Dr. Eley as "*the dean who escalated the reports about me and essentially facilitated my suspension*" suggests that Mohammad is the author of the Phone Script or at the very least, assisted in its drafting.

88. The Email Template similarly makes false and professionally damaging statements about Plaintiff:

Umaymah is completing her training as an MD/PhD in the Social Sciences, a field that is valued precisely because it provides physician-scientists with unique tools to analyze the processes through which systems of violence produce disease, injury, and premature death. Her training has prepared her to recognize the insidious forms of violence embedded in the structures that appear as the background of everyday life, as "just the way things are." She compared Emory's disgraceful firing of Palestinian physician Dr. Abeer AbouYabis to Dr. Joshua Winer's warm institutional welcome to illustrate a glaring disparity that reflects Emory's longstanding pattern of anti-Palestinian and anti-Muslim racism (further outlined in the Title VI complaint recently filed against Emory).

...It is the duty of every healthcare professional to ensure the safety of patients as well as medical students and trainees. How can we feel safe knowing Emory employs and protects physicians like Dr. Joshua Winer who has written openly about his participation in a military campaign that has been condemned as a genocide by countless international authorities in human rights and international law? ... Why does Emory allow a physician who participated in this genocidal campaign to provide care without any investigation into his involvement in war crimes committed by the IDF in Gaza, war crimes that have now been documented in thousands of videos and widely shared across

the Internet? Hold faculty and students accountable for their participation in or legitimization of the genocide of Palestinians.

89. The Phone Script expressly demanded that Plaintiff be fired from the School of Medicine, while the Email Template urged that Plaintiff be investigated. While the Phone Script requested that phone calls be made to two deans from the School of Medicine, emails sent via the Action Network platform were disseminated to 41 faculty members affiliated with Emory University and its School of Medicine.

90. At the time of this writing, 123,451 emails were sent to the deans of the School of Medicine via the Action Network website.

91. On or about January 29, 2025, NSJP, in collaboration with DAG, published an additional post again requesting support for Mohammad, adopting and further disseminating false and professionally damaging statements regarding Plaintiff (the “**Second NSJP DAG Post**”). The post stated, in part:

We [at NSJP] stand unequivocally with Umaymah and her truthful statements, that any physician-faculty who served in the IDF these last 16 months perpetuated a genocide...Although the IDF soldier physician was never identified as a result of the interview, despite the IDF soldier and faculty member having published his own op ed for the Times of Israel titled, “An ongoing quest to serve,” in which he proudly identified himself as an IDF reservist ready for deployment to perpetuate genocidal crimes in Gaza ... How can individuals who inflict dismemberment, torture, and slaughter return to their daily routines as medical professionals, claiming to be healers at US healthcare institutions.”<sup>19</sup>

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<sup>19</sup> National Students for Justice in Palestine, (@nationalsjp) and Doctors Against Genocide (@doctorsagainstgenocide), Instagram (January 29, 2025), [https://www.instagram.com/p/DFa5u96yFQj/?hl=en&img\\_index=1](https://www.instagram.com/p/DFa5u96yFQj/?hl=en&img_index=1) (last visited April 24, 2025).

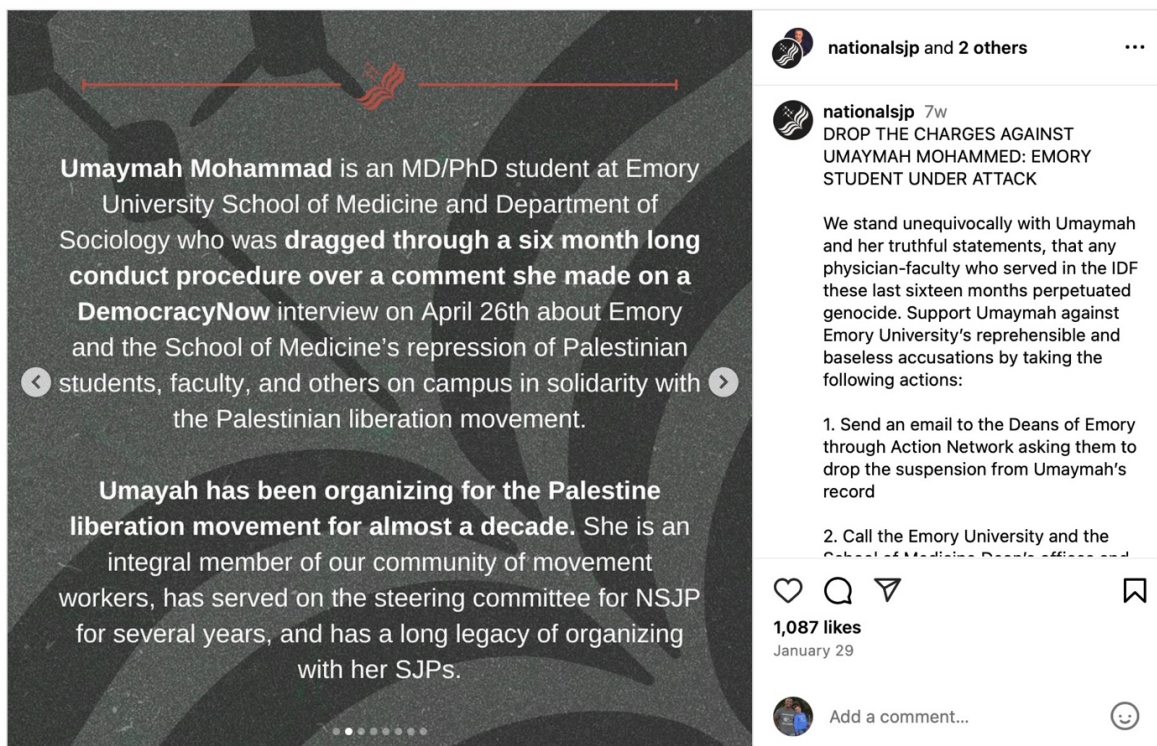
92. The Second NSJP DAG Post falsely and misleadingly characterized Mohammad's statements about Plaintiff as "truthful". Contrary to the false and professionally damaging assertion made by NSJP and DAG, Plaintiff has never identified himself as an IDF reservist "ready for deployment to perpetuate genocidal crimes in Gaza." Plaintiff's service during the referenced period was limited to providing medical care to injured soldiers and did not involve participation in or support for any military operations against civilians.

93. In the final two slides of the NSJP DAG Post, defendants NSJP and DAG again encouraged their followers to contact the deans of Emory University and its School of Medicine. The post called for the School of Medicine to rescind Mohammad's suspension and for Emory and the School of Medicine to investigate Plaintiff and/or terminate his employment. A link to the Email Template and Phone Script, which explicitly identified Plaintiff by name, repeated false and inflammatory allegations against him, and demanded that Emory and the School of Medicine investigate Plaintiff and/or terminate his employment, was included in the post.

94. The Second NSJP DAG Post received over 1,080 "likes" and was widely viewed and shared on social media, contributing to the continued dissemination of false and harmful statements about Plaintiff.

95. True and correct copies of the slides from the Second NSJP DAG Post are reproduced below for the Court's reference.









**Emory issued several allegations against Umaymah** after she had **anonymously compared** the cases of two faculty of medicine. The comparison was made of one Palestinian physician who was terminated in October 2023 for social media posts about Palestine and another faculty of medicine who was allowed to serve in the IDF during the genocide in early 2024 and resumed teaching at the institution. In her interview, she mentioned that the IDF soldier-physician "aided and abetted in a genocide, aided and abetted in the destruction of the healthcare system in Gaza, and in the murder of over 400 healthcare workers."

**nationalsjp and 2 others**

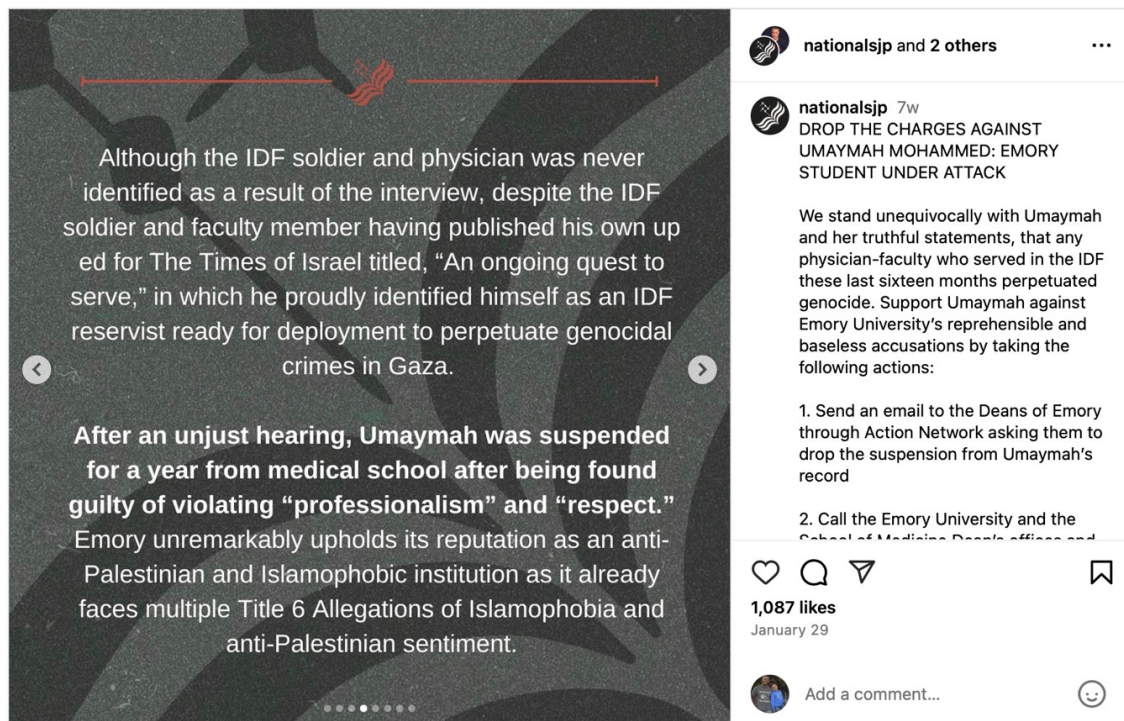
**nationalsjp** 7w  
DROP THE CHARGES AGAINST Umaymah MOHAMMED: EMORY STUDENT UNDER ATTACK

We stand unequivocally with Umaymah and her truthful statements, that any physician-faculty who served in the IDF these last sixteen months perpetuated genocide. Support Umaymah against Emory University's reprehensible and baseless accusations by taking the following actions:

1. Send an email to the Deans of Emory through Action Network asking them to drop the suspension from Umaymah's record
2. Call the Emory University and the School of Medicine Deans offices and

1,087 likes  
January 29

Add a comment...



Although the IDF soldier and physician was never identified as a result of the interview, despite the IDF soldier and faculty member having published his own up ed for The Times of Israel titled, "An ongoing quest to serve," in which he proudly identified himself as an IDF reservist ready for deployment to perpetuate genocidal crimes in Gaza.

**After an unjust hearing, Umaymah was suspended for a year from medical school after being found guilty of violating "professionalism" and "respect."** Emory unremarkably upholds its reputation as an anti-Palestinian and Islamophobic institution as it already faces multiple Title 6 Allegations of Islamophobia and anti-Palestinian sentiment.

**nationalsjp and 2 others**

**nationalsjp** 7w  
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1,087 likes  
January 29

Add a comment...





**We stand unequivocally with Umaymah and her truthful statements, that any physician-faculty who served in the IDF in the last sixteen months perpetuated genocide.**

Umaymah is one of many medical students and healthcare professionals facing severe scrutiny and punitive punishments for resisting genocide. In the last year, we have seen the instances of **Dr. Rupa Marya at UCSF**, a physician who was placed on leave and whose medical license was threatened by UCSF, and **Dr. Abeer AbuYabis**, a Palestinian physician who was terminated at Emory in October of 2023. U.S. medical schools and the healthcare system that upholds them are not any less complicit in genocide, Gaza has illuminated that for us in the most clear light.

**nationalsjp and 2 others**

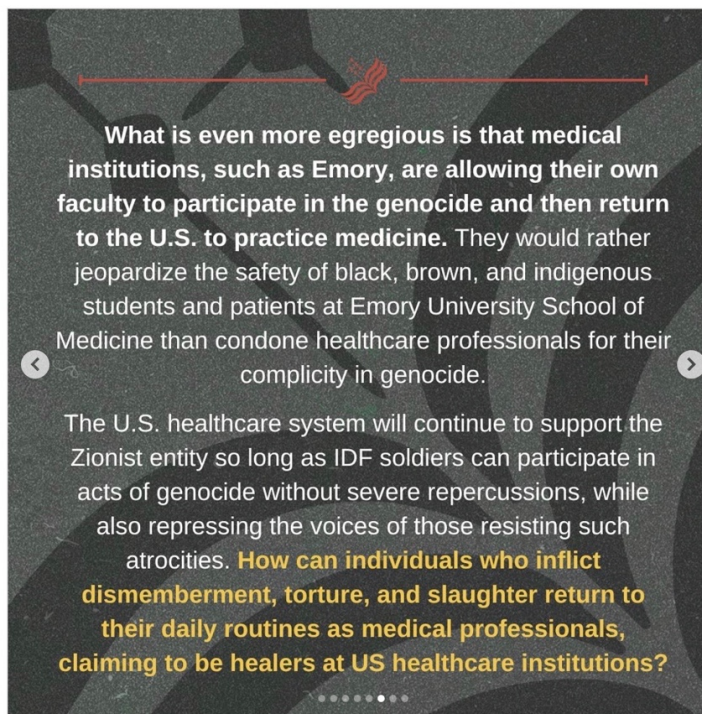
**nationalsjp** 7w  
DROP THE CHARGES AGAINST UMaymah MOHAMMED: EMORY STUDENT UNDER ATTACK

We stand unequivocally with Umaymah and her truthful statements, that any physician-faculty who served in the IDF these last sixteen months perpetuated genocide. Support Umaymah against Emory University's reprehensible and baseless accusations by taking the following actions:

1. Send an email to the Deans of Emory through Action Network asking them to drop the suspension from Umaymah's record
2. Call the Emory University and the School of Medicine Deans offices and

1,087 likes  
January 29

Add a comment...



**What is even more egregious is that medical institutions, such as Emory, are allowing their own faculty to participate in the genocide and then return to the U.S. to practice medicine. They would rather jeopardize the safety of black, brown, and indigenous students and patients at Emory University School of Medicine than condone healthcare professionals for their complicity in genocide.**

The U.S. healthcare system will continue to support the Zionist entity so long as IDF soldiers can participate in acts of genocide without severe repercussions, while also repressing the voices of those resisting such atrocities. **How can individuals who inflict dismemberment, torture, and slaughter return to their daily routines as medical professionals, claiming to be healers at US healthcare institutions?**

**nationalsjp and 2 others**

**nationalsjp** 7w  
DROP THE CHARGES AGAINST UMaymah MOHAMMED: EMORY STUDENT UNDER ATTACK


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2. Call the Emory University and the School of Medicine Deans offices and

1,087 likes  
January 29

Add a comment...





**OUR DEMANDS**

1. Dean Sandra Wong and Dean Bill Eley of Emory School of Medicine **drop the suspension charges** against MD/PhD candidate Umaymah Mohammad
2. Emory School of Medicine immediately **cease all targeted harassment of Palestinian students, staff, and faculty on campus** as well as those engaged in activism in solidarity with Palestine
3. Emory University and its School of Medicine **take accountability for faculty and students who may have deliberately participated in the genocide**, such as serving in the IDF, or are promoting pro-genocidal ideals in the classroom and on social media

**nationalsjp and 2 others**

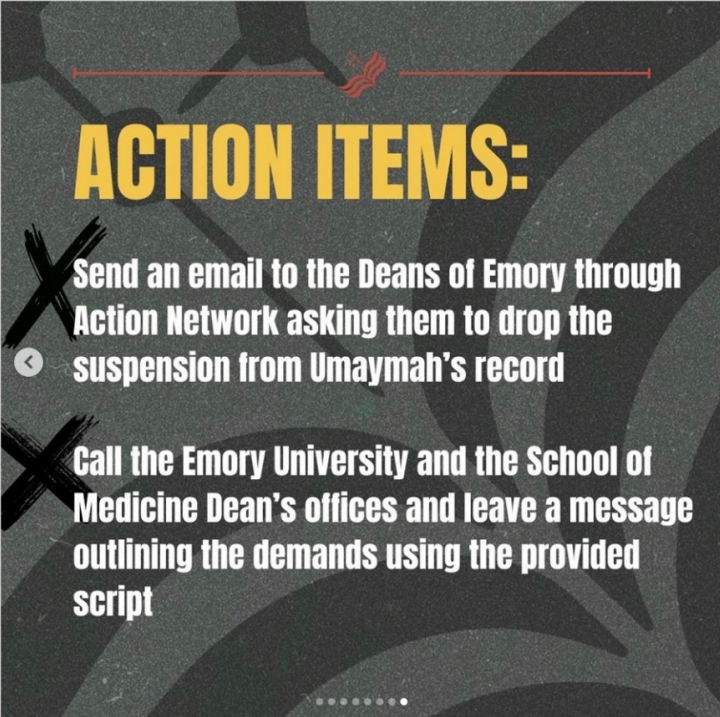
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1. Send an email to the Deans of Emory through Action Network asking them to drop the suspension from Umaymah's record
2. Call the Emory University and the School of Medicine Dean's offices and

1,087 likes  
January 29

Add a comment...



**ACTION ITEMS:**

1. Send an email to the Deans of Emory through Action Network asking them to drop the suspension from Umaymah's record
2. Call the Emory University and the School of Medicine Dean's offices and leave a message outlining the demands using the provided script

**nationalsjp and 2 others**

**nationalsjp** 7w  
**DROP THE CHARGES AGAINST Umaymah MOHAMMED: EMORY STUDENT UNDER ATTACK**

We stand unequivocally with Umaymah and her truthful statements, that any physician-faculty who served in the IDF these last sixteen months perpetuated genocide. Support Umaymah against Emory University's reprehensible and baseless accusations by taking the following actions:

1. Send an email to the Deans of Emory through Action Network asking them to drop the suspension from Umaymah's record
2. Call the Emory University and the School of Medicine Dean's offices and

1,087 likes  
January 29

Add a comment...

#### 4. Marya Published False Statements About Plaintiff

96. Mohammad and Marya are well acquainted. They spoke together during a panel discussion hosted on YouTube titled, “No Room for Neutrality: Marya, Mansour, Tahir, Mohammad, Smith”.<sup>20</sup> During Mohammad’s opening remarks, she introduced Marya as “a personal hero of mine.” More recently, on or about March 31, 2025, Mohammad and Marya presented on another panel together after which Marya congratulated Mohammad for her presentation via Instagram, “What an incredible presentation by med student Umaymah Mohammad...”<sup>21</sup> On information and belief, Marya and Mohammad also work together as founders of DAG.

97. Marya has repeatedly made false and damaging statements about Plaintiff. On information and belief, Marya learned about Plaintiff and his participation in the IDF from Mohammad.

98. Marya has frequently identified Plaintiff by name and used her social media platforms to spread harmful and reputationally damaging statements about him. Marya has posted about the Plaintiff on X numerous times, although her account was deactivated on or about March 24, 2025. As of the time of this writing,

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<sup>20</sup> Science and Nonduality, “No Room for Neutrality: Marya, Mansour, Tahir, Mohammad, Smith, YouTube, June 20, 2024, [https://www.youtube.com/watch?v=4g7gFp1\\_hQw](https://www.youtube.com/watch?v=4g7gFp1_hQw) (last visited April 24, 2025).

<sup>21</sup>Rupa Marya (@rupamarya), Instagram, March 25, 2025, <https://www.instagram.com/rupa.marya/p/DHm-eWvRenk/> (last visited April 24, 2025).

Marya's Instagram account remains active.

99. On or about December 16, 2024, Marya posted a thread on X<sup>22</sup> blaming Plaintiff for the termination of Dr. Abeer AbouYabis, another professor at the School of Medicine, and asserting that it was a double standard that Plaintiff was permitted to continue his work at the School of Medicine after serving in a genocide in the IDF. This post received over 6000 views.

Palestinian Hematologist Oncologist Professor fired at Emory in October 2023 for a social media post which was maliciously framed. They silence us here while they kill us there. The witch hunt this time was by the IDF soldier/medical school professor Joshua Winer at Emory who went to serve a genocide and then return to work at Emory. He's still employed.



100. In a separate comment on the thread, which received over 490 views,

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<sup>22</sup> Rupa Marya (@DrRupaMarya), X, December 16, 2024, <https://x.com/DrRupaMarya/status/1868747909396939268> (last visited March 20, 2025).

Marya falsely asserted that Plaintiff had served in Gaza during a genocide and that as a result, he should not be permitted to return to work at the School of Medicine.

This time, Marya included a photograph of Plaintiff in her post:

Palestinian female [Dr. Abeer AbouYabis] fired for her words uplifting Palestinian resistance to apartheid/occupation while white man IDF soldier serves in Gaza during the genocide and returns to work at Emory. This is what healthcare look like in US universities.



101. In this post, Marya conveniently omitted that the School of Medicine placed Dr. Abeer AbouYabis on administrative leave and ultimately terminated her employment after she posted on social media praising the “glory” of Palestinian terrorists shortly after the October 7 attacks. In her posts, Dr. Abeer AbouYabis celebrated the terrorists that infiltrated Israel’s borders via paragliders, called for Israel to become occupied Palestinian land, and vowed that Palestinians would make the ultimate sacrifice to ensure the slaughter of Israelis.

They got walls we got gliders  
 Glory to all resistance fighters  
 Palestine is our demand  
 No peace on stolen land  
 Not another nickel not another dime  
 We will pay For israel [sic] slaughter<sup>23</sup>

102. Furthermore, upon information and belief, AbouYabis had also posted a photo of Adolf Hitler along with a quote attributed to him, which read, “Jews are not people; they are animals.”



103. Dr. AbouYabis’s use of her social media platform to post a message glorifying Hamas fighters who infiltrated Israel’s borders during the October 7

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<sup>23</sup> See Stop Antisemitism (@stopantisemitism), X, October 16, 2023, available at, <https://x.com/stopantisemitism/status/1714098926637257049> (last visited April 24, 2025). See also Committee for Open Expression Investigation report, “Investigation into firing of Prof. AbouYabis”, Emory University, January 22, 2024, available at, [https://senate.emory.edu/\\_includes/documents/sections/committees/cfoe/cfoe-24-01-22-som-faculty-firing-deidentified-senate-edits1.pdf](https://senate.emory.edu/_includes/documents/sections/committees/cfoe/cfoe-24-01-22-som-faculty-firing-deidentified-senate-edits1.pdf); <https://nypost.com/2023/10/17/atlanta-cancer-doctor-put-on-leave-after-pro-hamas-post-celebrating-glory-of-terrorist-group/> (last visited April 24, 2025).



attacks received significant media attention.<sup>24</sup> On information and belief, her post was broadly condemned by members of the Atlanta community, many of whom submitted complaints to the administration of the School of Medicine. Plaintiff did not lead or coordinate any effort to seek Dr. AbouYabis's termination from the School of Medicine.

104. On or about January 3, 2025, in an article that Marya self-published on Substack entitled, "Sick From Genocide,"<sup>25</sup> Marya praised her own persistence in criticizing Jews that served in the IDF. The article went further to specifically target Plaintiff by falsely asserting that medical students are fearful of him because of his prior service in the IDF during what Marya wrongly referred to as a "genocide."

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<sup>24</sup> See e.g., Alyssa Guzman, *Atlanta cancer doctor put on leave after post celebrating Hamas' 'glory'*, N.Y. Post, (October 17, 2023), <https://nypost.com/2023/10/17/atlanta-cancer-doctor-put-on-leave-after-pro-hamas-post-celebrating-glory-of-terrorist-group/> (last visited April 24, 2025).

<sup>25</sup> Rupa Marya, *Sick from Genocide*, Substack (January 3, 2025), <https://rupamarya.substack.com/p/sick-from-genocide> (last visited April 24, 2025).

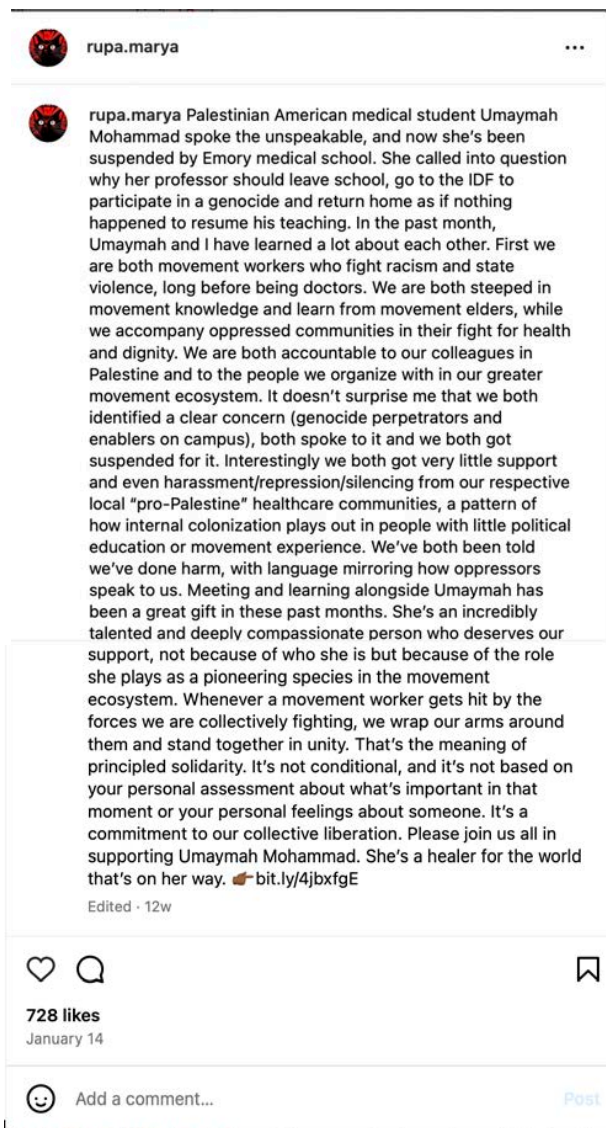
She kept talking. So did I.

Then came my suspension for naming that med students were afraid because they didn't know the status of someone on campus who had just come from a genocide zone--did they participate? Military service is mandatory. Med students all over the country are afraid of this, because some of their professors are actually going to serve in the genocide like this professor of surgery at Emory, who went to serve in a combat and medic unit during the ongoing genocide. He returned to work as if it was the most normal thing in the world to do. The students who are speaking up are getting hammered too.

The underlined portion of the text contains a link to Plaintiff's op-ed in the *Times of Israel* and the rest of the sentence falsely accuses him of participating in a genocide.

105. On January 14, 2025, in an Instagram post that received over "700" likes, Marya directed her followers to the Email Template and Phone Script that identified Plaintiff. Additionally, Marya falsely stated that Plaintiff served in the IDF for the purpose of participating in a genocide and is therefore unfit to teach:

Palestinian American medical student Umaymah Mohammad spoke the unspeakable, and now she's been suspended by Emory medical school. She called into question why her professor should leave school, go to the IDF to participate in a genocide and return home as if nothing happened to resume his teaching.

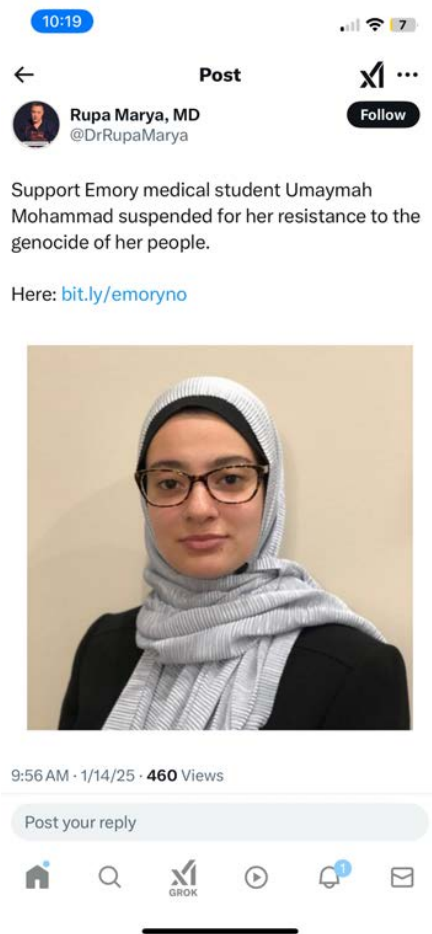


106. Marya posted a similar message on X on or about January 14, 2025,<sup>26</sup> which received over 440 views, and again directed her followers to support Mohammad “for her resistance to the genocide of her people” by following the hyperlink the Email Template and Phone Script, which both directly named the

<sup>26</sup>Rupa Marya (@DrRupaMarya), X, January 14, 2025, <https://x.com/DrRupaMarya/status/1879180889982472502> (last visited March 20, 2025).



Plaintiff.



107. On or about January 18, 2025, Defendant Marya published an article on Substack entitled “Decolonizing Medicine.” In that article, Marya falsely stated that Plaintiff had participated in genocide and war crimes and asserted that as a result, he was unfit to teach medical students. Marya’s intent here is clear: Plaintiff is a proud Zionist, and for Marya that is disqualifying since she is on the record advocating that “Zionism is a supremacist, racist ideology,” and that “The presence of Zionism in US medicine should be examined as a structural impediment to health

equity.”<sup>27</sup>

108. Additionally, Marya included a hyperlink directing readers to the Email Template and Phone Script, which explicitly identified Plaintiff by name, repeated false and inflammatory allegations against him, and demanded that Emory and the School of Medicine investigate Plaintiff and/or terminate his employment:

I am grateful to medical students like Umaymah Mohammad, whose courage shines as she shares her horror that *a professor at Emory went to serve a combat unit during the genocide* and came back as if everything was perfectly normal. It is not. Genocide is the most intense expression of racism. *Dr. Josh Winer at Emory University is not fit for teaching medical students* in a pluralistic society, especially not ones whose family is currently being annihilated by Israel. Umaymah was suspended for speaking up about this violation of her safety and civil rights. Her stance is a moral one—and a missing one—in a colonial medical system that supports genocidal physicians and silences ones who speak up to stop a genocide. The agenda could not be clearer. Please support Umaymah here. (Emphasis added).<sup>28</sup>

On or about January 26, 2025, the same article—published under a different title—was republished by *Common Dreams*, an online news outlet, which further disseminated the false and defamatory statements concerning Plaintiff to a broader audience.<sup>29</sup>

109. On or about January 18, 2025, in an X post that received over 300

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<sup>27</sup> Katy Grimes, *UCSF Med School Professor Claims Med Students Are Triggered by Israeli Student*, Cal. Globe (Sept. 30, 2024), <https://californiaglobe.com/fr/ucsf-med-school-professor-claims-med-students-are-triggered-by-israeli-student/> (last visited May 20, 2025).

<sup>28</sup> Rupa Marya, *Decolonizing Medicine*, Deep Medicine (Feb. 3, 2024), <https://rupamarya.substack.com/p/decolonizing-medicine> (last visited April 24, 2025).

<sup>29</sup> See Rupa Marya, “Moving from Colonial to Liberation Medicine in a Time of Genocide”, *Common Dreams*, <https://www.commondreams.org/opinion/from-colonial-to-liberation-medicine>.

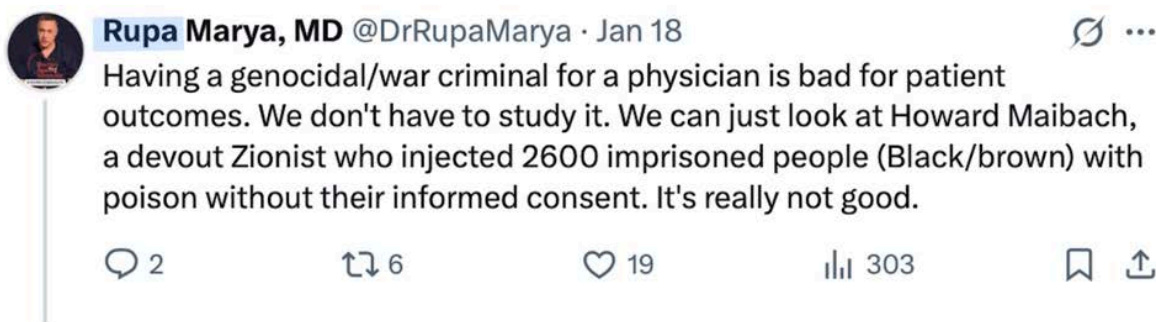
views, Marya expressed continued support for Mohammad: “I am grateful for students like Umaymah Mohammad. Support her here.”<sup>30</sup> Marya then provided a link to the Email Template and Phone Script, which explicitly identified Plaintiff by name, repeated false and inflammatory allegations against him, and demanded that Emory and the School of Medicine investigate Plaintiff and/or terminate his employment.



Responding to her own post in thread format, Marya then referred to Plaintiff as a genocidal war criminal who “is bad for patient outcomes.”<sup>31</sup> This comment received over 300 views.

<sup>30</sup>Rupa Marya (@DrRupaMarya), X, January 18, 2025, <https://x.com/DrRupaMarya/status/1880629547282071883> last visited (April 24, 2025).

<sup>31</sup> *Id.*



110. In this thread, Marya made further false statements about Plaintiff by comparing him to a well-known Jewish doctor who publicly apologized for conducting unethical experiments during the 1960s and 1970s. Marya asserted that it was the physician's Zionist beliefs that were to blame, and that his and Plaintiff's shared Zionist beliefs negatively affected patient outcomes. Zionism, in its essence, is the belief in the right of the Jewish people to self-determination in their ancestral homeland, and the vast majority of Jews are Zionists. Like many Jews, Plaintiff's Zionist beliefs are integral to his Jewish identity. Marya's false assertion that Plaintiff is unfit to practice medicine merely because he is a Zionist is not only false, but overtly antisemitic.

111. On or about January 31, 2025, Marya published an Instagram post—receiving over 240 likes—in which she expressed support for Mohammad and again made false and inflammatory statements about Plaintiff. Specifically, Marya falsely claimed that Plaintiff served in a combat unit during a genocide and, as a result, was unfit to teach. In the same post, Marya again directed her readers to the Email Template and Phone Script that explicitly identified Plaintiff by name, repeated false

and inflammatory allegations against him, and demanded that Emory and the School of Medicine investigate Plaintiff and/or terminate his employment:

Emory suspended Palestinian American student Umaymah Mohammad after she publicly spoke about her concern that a professor of surgery went to serve in the IDF in [a] combat unit during the genocide and returned to teach, as if it's totally normal and acceptable. It's not. Physicians should never normalize, endorse or participate in genocide. Genocide is the most egregious expression of racism. Join me in sending a letter of support for Umaymah here! Every voice helps. Please lift yours. [bit.ly/4jbxfgE](https://bit.ly/4jbxfgE)<sup>32</sup>

112. In the same post, Marya further publicized Mohammad's *Mondoweiss* op-ed, posting excerpts from Mohammad's piece that falsely stated that there is a genocide in Gaza as a result of IDF soldiers like Plaintiff and that such soldiers are unfit to teach medical students or treat patients:

This genocide relies not only on IDF soldiers pulling the trigger ... What kind of care are medical students learning when these are our mentors and educators? What kind of care are patients receiving from doctors who believe in the legitimacy of apartheid, and that some human lives are not as important as others?<sup>33</sup>

Marya had no basis on which to make the false and inflammatory statement that Plaintiff believes in the legitimacy of apartheid or that some human lives are not as important as others. It was based solely on Plaintiff's identity, as a Jewish Israeli.


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<sup>32</sup> Rupa Marya (@rupamarya), Instagram, January 31, 2025, [https://www.instagram.com/rupa.marya/p/DFf5ETsyFXB/?img\\_index=1](https://www.instagram.com/rupa.marya/p/DFf5ETsyFXB/?img_index=1) (last visited April 24, 2025).

<sup>33</sup> *Id.*

"Like many medical schools, Emory has proven that its missions of "care" and "justice" are in name only, there to obfuscate their own complicity in harm."

UMAYMAH MOHAMMAD



EMORY UNIVERSITY  
OF GENOCIDE

**Mondoweiss**  
News & Opinion About Palestine, Israel & the United States

OPINION

### I was suspended from Emory over my Palestine activism. I will not let it stop me.

When I applied to Medical School at Emory University, I was open about my dedication to Palestine activism, and was told it would never impact my studies. But now, the school has suspended me for that very reason.

BY Umaymah Mohammad - JANUARY 21, 2025

rupa.marya and sanad.solidaritynetwork4hcws

rupa.marya Emory suspended Palestinian American student Umaymah Mohammad after she publicly spoke about her concern that a professor of surgery went to serve in the IDF in combat unit during the genocide and returned to teach, as if it's totally normal and acceptable. It's not. Physicians should never normalize, endorse or participate in genocide. Genocide is the most egregious expression of racism. Join me in sending a letter of support for Umaymah here! Every voice helps. Please lift yours. [bit.ly/4jbxfgE](https://bit.ly/4jbxfgE)

Edited · 9w

sashkins\_1 Hello the bit.ly doesn't seem to be working 😊

9w Reply

Hide replies

rupa.marya @sashkins\_1 works for me! try again?

9w 1 like Reply

sashkins\_1 Perfect 🍌

9w Reply

249 likes  
January 31

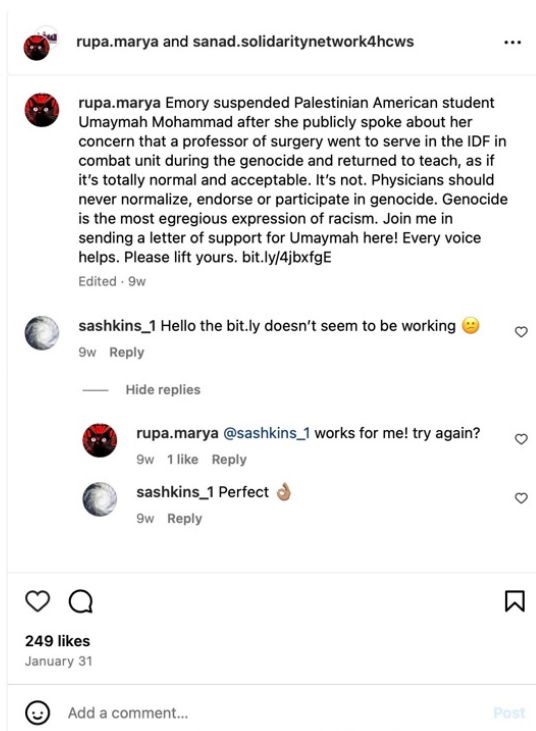
Add a comment...

Post



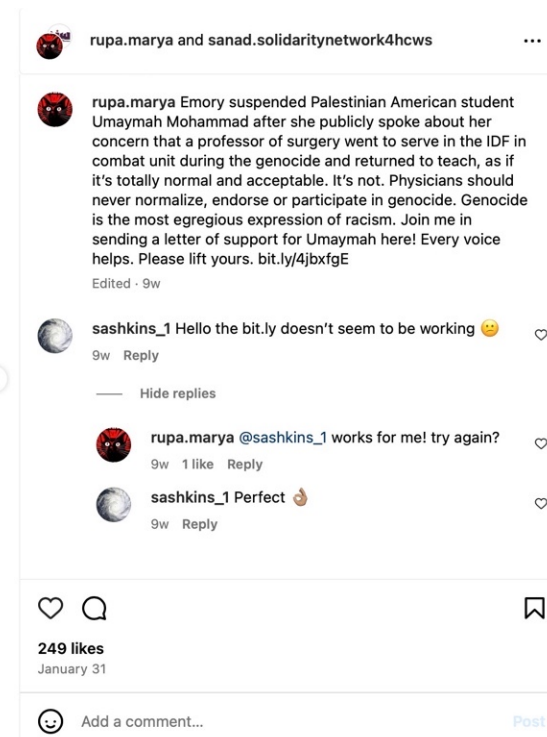
**“This genocide relies not only on IDF soldiers pulling the trigger, but also on U.S. physicians and institutions legitimizing the destruction of Gaza’s health system.”**

UMAYMAH  
MOHAMMAD



**“What kind of care are medical students learning when these are our mentors and educators? What kind of care are patients receiving from doctors who believe in the legitimacy of apartheid, and that some human lives are not as important as others?”**

UMAYMAH  
MOHAMMAD



113. On or about February 11, 2025, Marya published a post that received

over 580 “likes” in collaboration with UCSD Divest Coalition on Instagram, which falsely stated that Plaintiff was unfit to be in a position of authority over Palestinian students after he returned from participating in a genocidal military campaign that the International Criminal Court (ICC) deemed to be genocidal. However, the ICC never issued any such ruling. The ICC’s jurisdiction is limited to prosecuting individuals, not states or their militaries. Furthermore, Israel is not a member state of the ICC, and a number of countries, including the United States and the United Kingdom, have issued statements holding that the ICC lacks the necessary jurisdiction to even prosecute Israeli nationals. Marya then again directed her followers to the Email Template and Phone Script, which explicitly identified Plaintiff by name, repeated false and inflammatory allegations against him, and demanded that Emory and the School of Medicine investigate Plaintiff and/or terminate his employment:<sup>34</sup>

[@emorymedschool](#) has suspended MD/PhD Candidate Umaymah Mohammad for a brilliant interview with DemocracyNow in which she asked WHY an Emory physician who volunteered with an IDF combat unit in Gaza and participated in a military campaign that the ICC has deemed an attempt to exterminate an entire people--her people--was allowed to return to Emory School of Medicine and remain in a position of power and authority over Palestinian students like herself as her teacher.

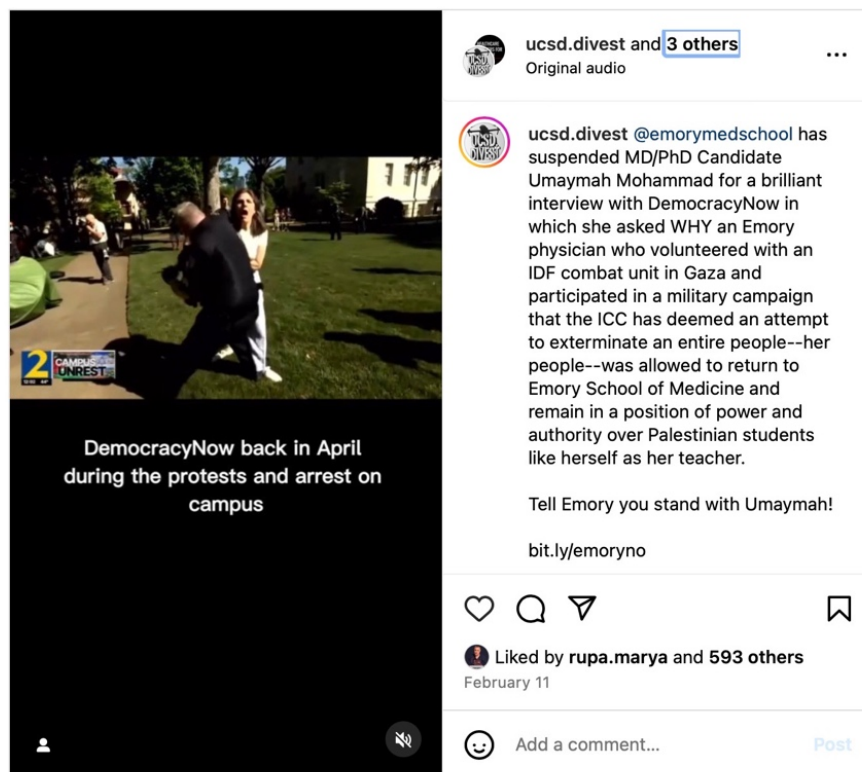
Tell Emory you stand with Umaymah!

[bit.ly/emoryno](https://bit.ly/emoryno)

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<sup>34</sup> Rupa Marya (@rupamarya), Instagram, February 11, 2025, [https://www.instagram.com/ucsd.divest/reel/DF8\\_kBhyk9r/](https://www.instagram.com/ucsd.divest/reel/DF8_kBhyk9r/) (last visited April 24, 2025).





114. On or about February 17, 2025, Marya made further false statements about Plaintiff on X, posting: “...There are an estimated 23,000 Americans serving in the IDF, murdering Arabs for sport. When these people come back home, what protection do we have? Studies show that veterans of genocides (i.e. war criminals) can be deeply violent people.”<sup>35</sup> This post received over 87,000 views. In a comment to this post, Marya added, “Some of them are professors of surgery at places like @EmoryMedicine[.] Dr Josh Weiner [sic] has been working hard to push Palestinian

<sup>35</sup> Rupa Marya (DrRupaMarya), X, February 17, 2025, <https://x.com/DrRupaMarya/status/1891514266420703373> (last visited 3/20/25).

doctors and med students out of the university.” This comment, which contained a photo of Plaintiff, received over 2000 views.





115. In this post, Marya sought to legitimize her false statement that Plaintiff is a veteran of genocide and a war criminal by referencing alleged studies finding that veterans of genocides can be “deeply violent people” and implying that Plaintiff is a deeply violent person, which he is not. Furthermore, Marya falsely and baselessly asserted that the Plaintiff was “working hard to push Palestinian doctors and med students out of the university.”

116. On or about February 24, 2025, in a post on X that received 1000 views, Marya falsely stated that Plaintiff’s medical license would be revoked due to his service in the IDF:<sup>36</sup>

<sup>36</sup> Rupa Marya (@DrRupaMarya), X, February 24, 2025, <https://x.com/DrRupaMarya/status/1894050607880638528> (last visited April 24, 2025).

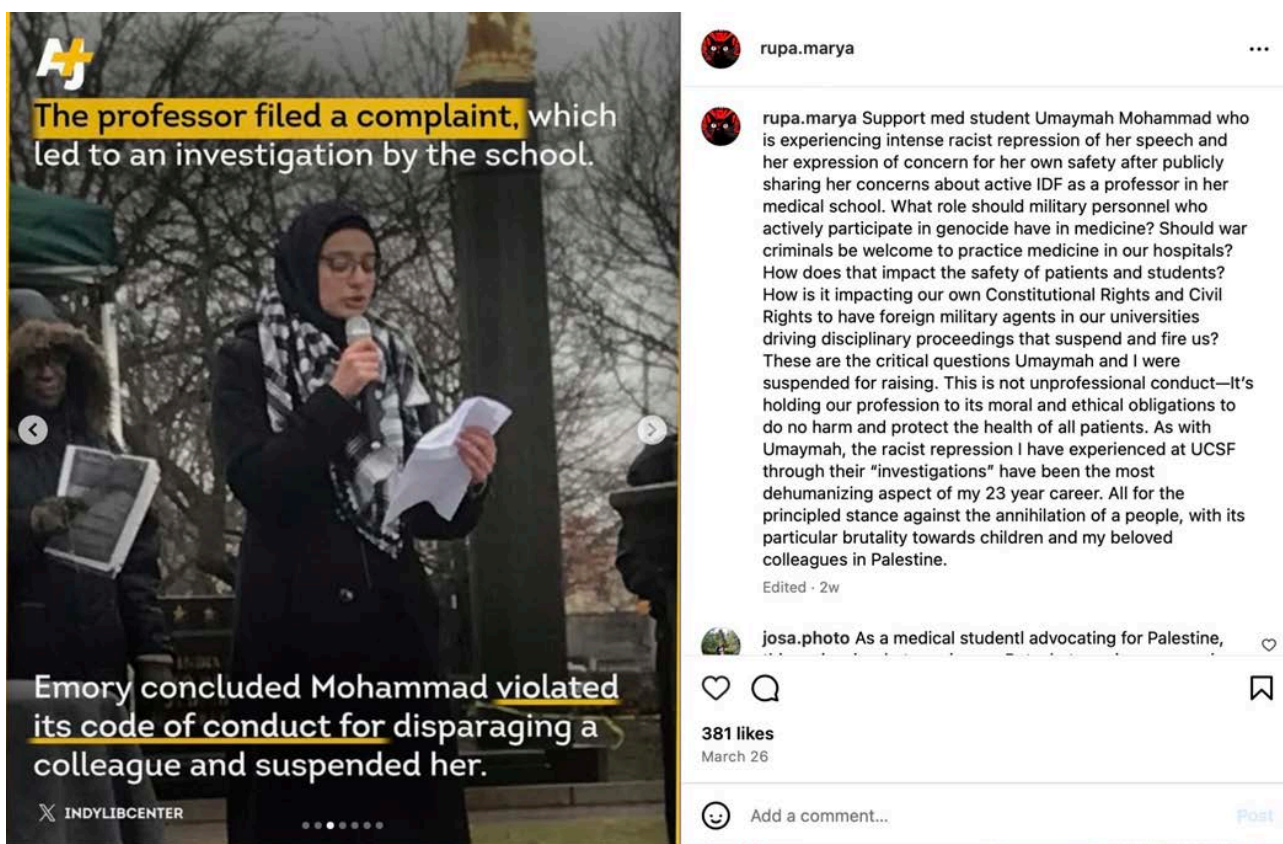
They've been at my license for 17 months and counting. Funny/not funny thing is that it's doctors who have served in the IDF during a genocide like Dr Josh Weiner [sic] at Emory who will get his license revoked. Not those of us who insisted the killing stop.



117. On or about March 26, 2025, Marya published another post on Instagram in which she again made false and inflammatory statements about Plaintiff. In the post, Marya again directed her readers to the hyperlink containing the Email Template and Phone Script that explicitly named Plaintiff, repeated false

and inflammatory allegations against him, and demanded that Emory and the School of Medicine investigate him and/or terminate his employment:

Support med student Umaymah Mohammad who is experiencing intense racist repression of her speech and her expression of concern for her own safety after publicly sharing her concerns about active IDF as a professor in her medical school. What role should military personnel who actively participate in genocide have in medicine? Should war criminals be welcome to practice medicine in our hospitals? How does that impact the safety of patients and students? How is it impacting our own Constitutional Rights and Civil Rights to have foreign military agents in our universities driving disciplinary proceedings that suspend and fire us?<sup>37</sup>



<sup>37</sup> Rupa Marya (@rupamarya), Instagram, March 26, 2025, [https://www.instagram.com/rupa.marya/p/DHqtKosJ8t2/?img\\_index=1](https://www.instagram.com/rupa.marya/p/DHqtKosJ8t2/?img_index=1) (last visited April 24, 2025).



118. In this post, Marya asserted that Mohammad should be applauded for publicly sharing her concerns about Plaintiff, who Marya wrongly described as an “active” IDF soldier. Marya also falsely stated that Plaintiff actively participated in a genocide, is a war criminal that should not be permitted to practice medicine, and is not safe to teach students or treat patients. Marya further falsely asserted that Plaintiff is a foreign military agent that should not be permitted to drive disciplinary proceedings resulting in the suspension of students or firing of staff, such as Dr. Abou-Yabis. In fact, Plaintiff is a US citizen who concluded his IDF service upon his return to the United States and is no longer an active member of the IDF. Additionally, Plaintiff did not “drive” or supervise the disciplinary process that resulted in Mohammad’s suspension or Dr. Abou-Yabis’ suspension.

### **5. CAIR Georgia and CAIR-Foundation Made False Statements About Plaintiff**

119. On February 11, 2025, CAIR Georgia held the Press Conference in which it called on Emory and the School of Medicine to reinstate Mohammad and rescind the disciplinary charges against her.<sup>38</sup> In advance and in promotion of the Press Conference, CAIR Georgia issued a press release, which included a hyperlink

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<sup>38</sup> CAIR-Georgia, *Emory Faculty and Students Ask Emory School of Medicine to Reinstate*, Facebook (Feb. 11 2025), [https://www.facebook.com/CAIRGA/videos/cair-georgia-emory-faculty-and-students-ask-emory-school-of-medicine-to-reinstat/674551304896516/https://www.facebook.com/watch/live/?ref=watch\\_permalink&v=674551304896516](https://www.facebook.com/CAIRGA/videos/cair-georgia-emory-faculty-and-students-ask-emory-school-of-medicine-to-reinstat/674551304896516/https://www.facebook.com/watch/live/?ref=watch_permalink&v=674551304896516) (last visited April 24, 2025).

to Mohammad's Democracy Now Interview, thereby adopting and further disseminating the false and inflammatory statements that Mohammad had made about Plaintiff during the interview.<sup>39</sup>

120. During the Press Conference, Mohammad delivered her pre-written CAIR Speech, in which she made numerous false and inflammatory statements about Plaintiff, discussed in detail *infra*.

121. Upon information and belief, CAIR Georgia was aware of the false and reputationally damaging statements Mohammad would make about Plaintiff in her CAIR Speech, and knowingly provided her with a platform to do so.

122. Immediately following the statements Mohammad made about Plaintiff in her CAIR Speech, CAIR Georgia's executive director, Azka Mahmood (**"Mahmood"**), falsely stated that Plaintiff supported the perpetration of war crimes:

...You just heard from Umaymah Mohammad, an Emory student unjustly suspended from Emory School of Medicine for her advocacy for Palestine. It is evident that at Emory School of Medicine, voicing support for victims of human rights violations is swiftly punished ... [The fact] that faculty and students join support for Israel's perpetration of war crimes is conveniently ignored or covered up.

123. Notwithstanding the falsity of the statements made during the Press

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<sup>39</sup> CAIR-Georgia, *Emory Faculty and Students Call on Emory School of Medicine to Reinstate Wrongfully Suspended Palestinian-American Student*, (Feb. 11, 2025), [https://www.cair.com/press\\_releases/cair-ga-emory-faculty-and-students-call-on-emory-school-of-medicine-to-reinstate-wrongfully-suspended-palestinian-american-student/](https://www.cair.com/press_releases/cair-ga-emory-faculty-and-students-call-on-emory-school-of-medicine-to-reinstate-wrongfully-suspended-palestinian-american-student/) (last visited April 24, 2025).

Conference by both Mohammad and Mahmood, CAIR Georgia published the complete video recording of the Press Conference on its official Facebook page, thereby adopting and further disseminating the false and reputationally damaging statements concerning Plaintiff to the public.

124. On or about February 11, 2025, both CAIR Georgia and CAIR-Foundation published the WSB-TV Segment on their respective Instagram accounts in a post that they collaborated on (the “**CAIR Team Post**”), thereby adopting the messages communicated in the CAIR Team Post as their own. The WSB-TV Segment included footage from the Democracy Now Interview in which Mohammad made false statements about at Plaintiff, including the following:

WBS-TV Reporter: [Mohammad’s] violation came from an interview with Democracy Now back in April during the protests and arrests on [Emory] campus. Mohammad directed allegations at an unnamed Emory doctor volunteering with the Israeli army. Here’s a portion from [Democracy Now’s] YouTube channel.

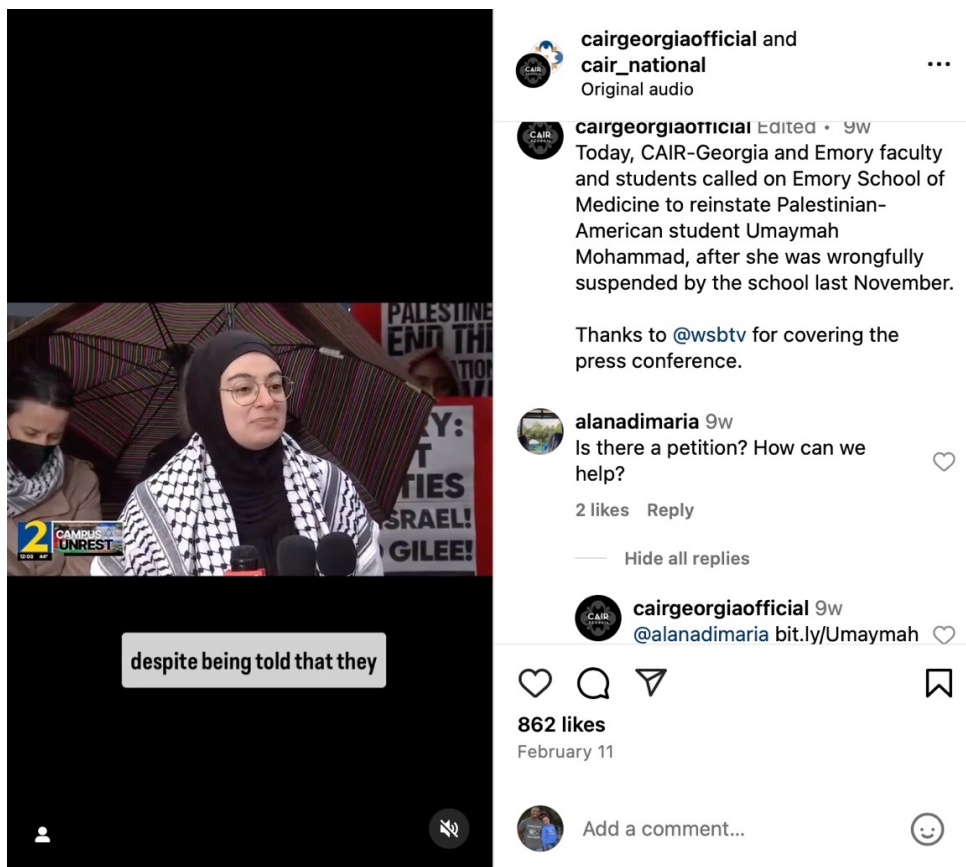
125. The WSB-TV Segment then showed a clip from Mohammad’s Democracy Now Interview, during which Mohammad made the following false statements about Plaintiff:

This man participated in aiding and abetting a genocide, in aiding and abetting the destruction of the healthcare system in Gaza.

126. In the comments section of CAIR Team Post, a user inquired about how to support Mohammad and whether a petition was available. CAIR Georgia replied to the comment by providing a link to the previously circulated Email Template and



Phone Script—which explicitly identified Plaintiff by name, repeated false and inflammatory allegations against him, and demanded that Emory and the School of Medicine investigate Plaintiff and/or terminate his employment.



127. On or about March 24, 2025, CAIR Georgia posted a screen shot of the Guardian Article on its Instagram account and issued the following statement:<sup>40</sup>

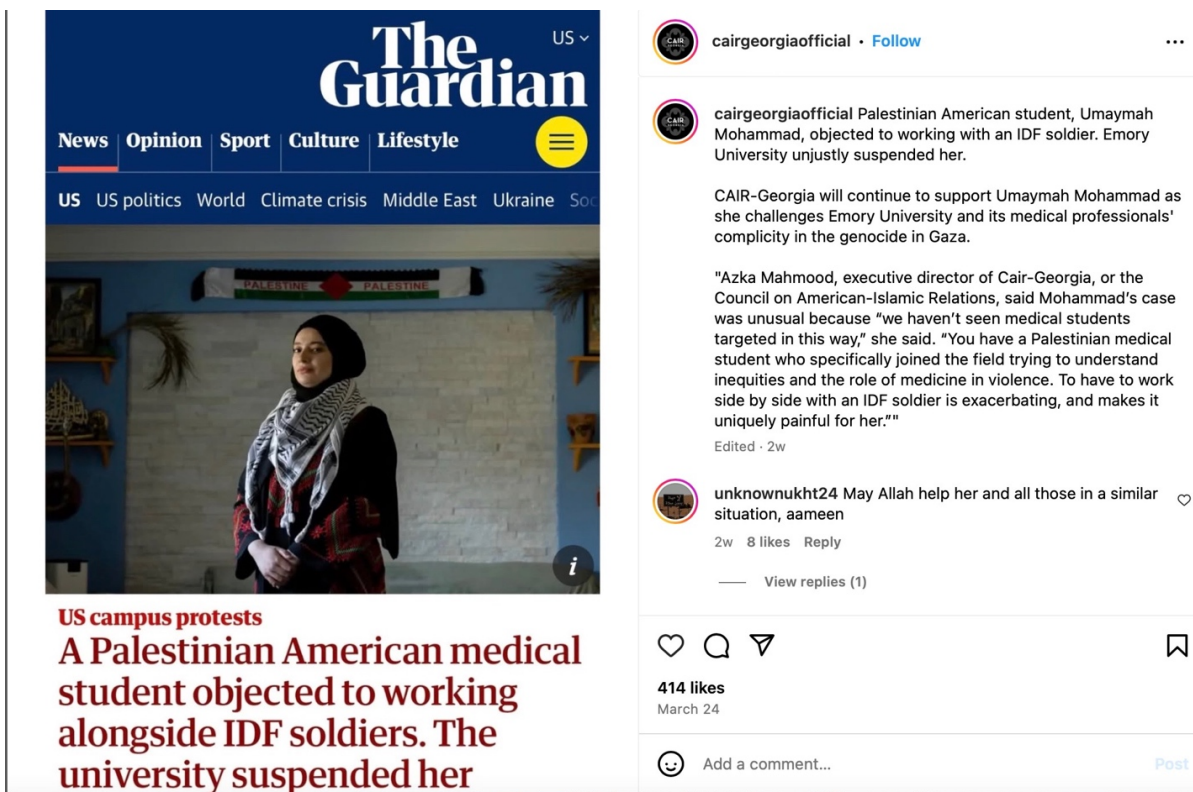
Palestinian American student, Umaymah Mohammad, objected to working with an IDF soldier. Emory University unjustly suspended her. CAIR-Georgia will continue to support Umaymah Mohammad as she challenges Emory University and its medical professionals' complicity in the genocide in Gaza.

<sup>40</sup> CAIR-Georgia (@cairgeorgia), Instagram, March 24, 2025, <https://www.instagram.com/p/DHla3oUOp8/> (last visited April 24, 2025).

Upon information and belief, Plaintiff is the only medical professional at Emory University that Mohammad has accused of being complicit in genocide in Gaza.

128. The same Instagram post quoted an excerpt from the Guardian Article, in which CAIR Georgia's executive director provided the following statement for publication:

You have a Palestinian medical student who specifically joined the field trying to understand inequities and the role of medicine in violence. To have to work side by side with an IDF soldier is exacerbating, and makes it uniquely painful for her.



129. Although Plaintiff was not named directly in CAIR Georgia's post featuring the Guardian Article, he is readily identifiable as the individual being referenced. Plaintiff is the only faculty member at the School of Medicine who

served in the IDF following the October 7 attacks.

## **6. Emory SJP Published False Statements About Plaintiff**

130. On or about January 14, 2025, Emory SJP shared the First NSJP and DAG Post on its Instagram account, thereby adopting and further disseminating the false and reputationally damaging statements made therein about Plaintiff.<sup>41</sup>

131. On or about February 13, 2025, Emory SJP collaborated on another Instagram post<sup>42</sup> that recounted the false and reputationally damaging statements made by Mohammad during her Democracy Now Interview:

During the [Democracy Now!] interview, [Mohammad] referred to an IDF soldier-physician who works at Emory without naming him. She said that this individual, “aided and abetted in a genocide, aided and abetted in the destruction of the healthcare system in Gaza, and in the murder of over 400 healthcare workers, and is now back at Emory, so called teaching medical students and residents how to take care of patients.

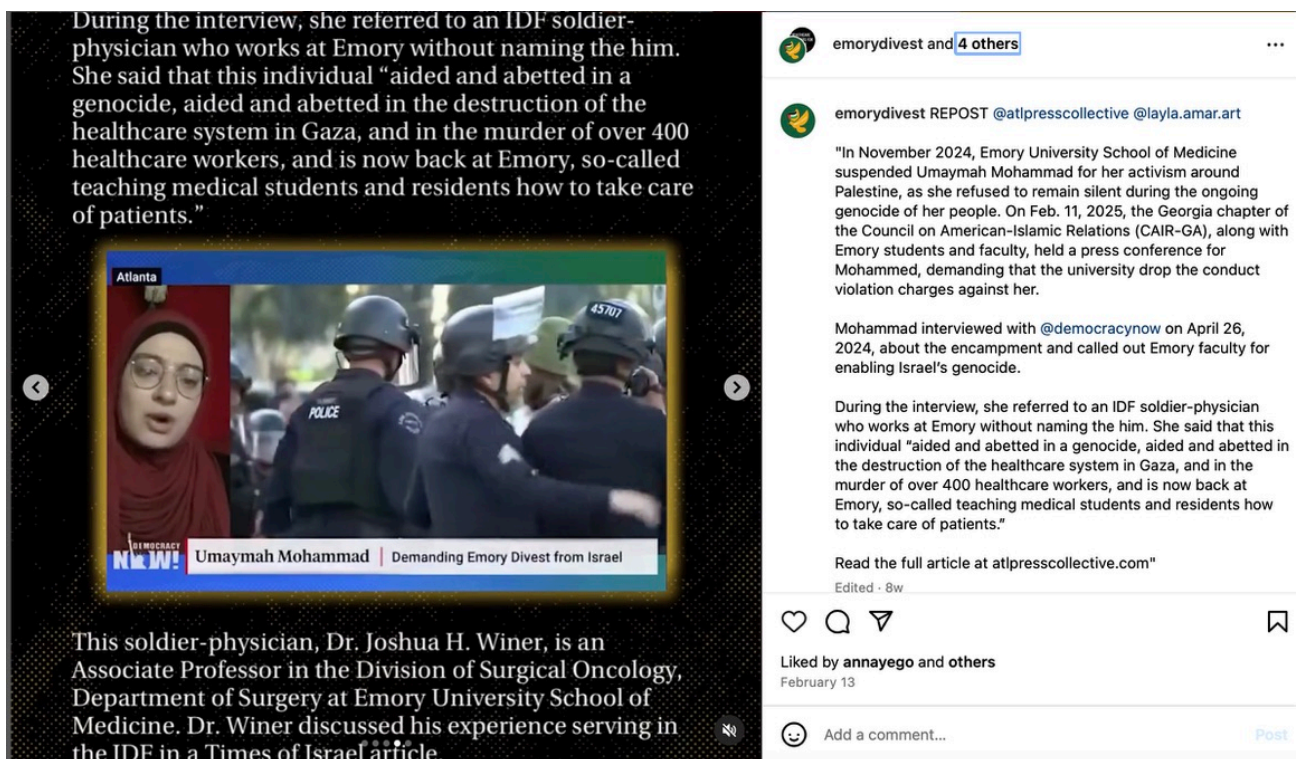
132. Emory SJP then explicitly identified Plaintiff as the IDF soldier-physician referenced in the interview:

This soldier-physician, Dr. Joshua H. Winer, is an Associate Professor in the Division of Surgical Oncology, Department of Surgery at Emory School of Medicine. Dr. Winer discussed his experience of serving in the IDF in a Times of Israel article.

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<sup>41</sup> Emory Students for Justine in Palestine (@Emorysjp), Instagram, January 14, 2025, [https://www.instagram.com/p/DE0dxA6vNB-/?img\\_index=2](https://www.instagram.com/p/DE0dxA6vNB-/?img_index=2) (last visited April 24, 2025).

<sup>42</sup> Emory Students for Justine in Palestine (@Emorysjp), Instagram, February 13, 2025, [https://www.instagram.com/p/DGBfxG0J2gT/?img\\_index=4](https://www.instagram.com/p/DGBfxG0J2gT/?img_index=4) (last visited April 24, 2025).



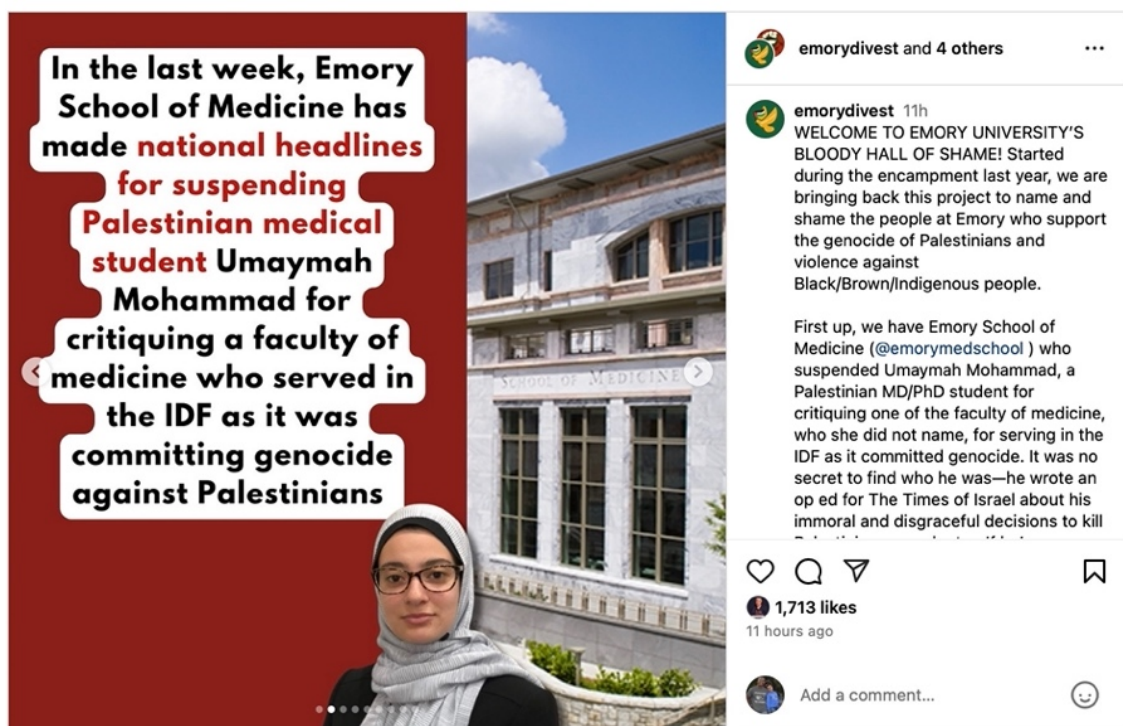
This post also included a video clip of Mohammad during the Democracy Now Interview.

133. On or about March 28, 2025, Emory SJP collaborated on a third Instagram post, “welcoming” Plaintiff to the School of Medicine’s so-called “Bloody Hall of Shame”.<sup>43</sup> The post included the following caption, which was positioned next to a photograph of Mohammad:

In the last week, Emory School of Medicine has made national headlines for suspending Palestinian medical student Umaymah Mohammad for critiquing a faculty of medicine who served in the IDF as it was committing a genocide against Palestinians.

<sup>43</sup> Emory Students for Justice in Palestine (@Emorysjp), Instagram, March 27, 2025, [https://www.instagram.com/emorydivest/p/DHtYwfRuGOS/welcome-to-emory-universitys-bloody-hall-of-shame-started-during-the-encampment-/?img\\_index=1](https://www.instagram.com/emorydivest/p/DHtYwfRuGOS/welcome-to-emory-universitys-bloody-hall-of-shame-started-during-the-encampment-/?img_index=1) (last visited April 24, 2025).





134. In a separate slide of the same post, Emory SJP, in collaboration with Emory Divest Coalition and other Instagram users, attempted to minimize Mohammad’s responsibility for identifying Plaintiff by asserting that she never named him directly. The post stated:

Although Umaymah never mentioned the name of the IOF soldier-doctor, he wrote an article identifying himself for the Times of Israel in which he says, “I started to volunteer for all positions [in the IDF], military and civilian” – Joshua Winer.

135. In its effort to defend Mohammad, Emory SJP inadvertently highlighted the extent to which Mohammad’s false statements unmistakably pointed to Plaintiff as the individual referenced.

136. In the same slide, alongside a photograph of Plaintiff against the backdrop of exploding buildings, Emory SJP also falsely asserted that Plaintiff had described himself as “a physician with military combat experience against Palestinians,” a characterization that is entirely inaccurate and unsupported by any public statement or writing by Plaintiff.



137. As a direct and proximate result of the widespread adoption and dissemination of these false statements, Plaintiff has suffered significant, ongoing and enduring public embarrassment, emotional distress, and harm to his professional reputation. Plaintiff fears for his personal safety, the safety of his family, and the risk of targeted harassment or violence due to the public and inflammatory nature of



the accusations made against him. Additionally, the damage to Plaintiff's professional reputation, the public pressure placed on his employer through the dissemination of the Email Template and Phone Script, and the Defendants' coordinated social media campaign have caused Plaintiff to fear for the future of his medical career and financial livelihood.

### **CLAIMS FOR RELIEF**

#### **COUNT I**

#### **All Defendants**

#### **Defamation Per Se Under Georgia Law**

138. Plaintiff repeats and re-alleges paragraphs 25–137 as if set forth fully herein.

139. A statement is defamatory per se when it is injurious on its face and does not require innuendo. In such cases, damages are inferred.

140. Charges made against a person in reference to their trade, office, or profession that are calculated to injure them in that regard constitute defamation per se.

141. Georgia courts have held that the legal standard for slander per se applies equally to libel per se.

142. An opinion is defamatory per se if it can reasonably be interpreted, according to the context of the entire writing or statement, to state or imply defamatory facts that are capable of being proved false.

143. Here, Defendants made numerous false and defamatory statements about Plaintiff with the intent to damage his professional reputation. These statements were widely distributed, including via social media, news publications, and television broadcasts. Defendants cannot avoid liability for those defamatory statements that did not identify Plaintiff by name because Plaintiff was easily identifiable based on the specific details that Defendants provided in such statements.

144. Mohammad made the following false and defamatory statements about Plaintiff:

- a. On or about April 26, 2025, during the Democracy Now Interview,

Mohammad falsely stated the following:

One of the professors of medicine we have at Emory recently went to serve as a volunteer medic in the Israeli Offense Force [sic] and recently came back. This man participated in aiding and abetting a genocide, in aiding and abetting the destruction of the healthcare system in Gaza and the murder of over 400 healthcare workers, and is now back at Emory so-called teaching medical students and residents how to take care of patients. I mean, the disconnect is, for me, very obvious. And it's very frustrating that the School of Medicine and the greater Emory community continues to ignore these major disconnects.

- b. On or about November 4, 2024, during a podcast episode entitled

“International Student Movements Against Genocide in Palestine”

hosted by the International Union of Scientists, Mohammad falsely

stated that Plaintiff was complicit in genocide and that he directly participated in the taking of life:

At Emory University and other institutions here in the US, there are physicians who have served in the IDF and in fact, a physician at Emory has actually volunteered to serve in both a medical and military capacity in this last year in the genocide... our institutions are literally employing people who are not just complicit in these genocides, but ... their hands are directly participating in the taking of life ... this simple individual example is a reflection of a system that chooses which lives to save with one hand and which lives to take with the other.

- c. On or about January 21, 2025, *Mondoweiss* published an op-ed authored by Mohammad titled, “I was suspended from Emory over my Palestine activism. I will not let it stop me.” In the op-ed, Mohammad falsely stated that Plaintiff believes in the legitimacy of apartheid and participated in aiding and abetting a genocide and the destruction of Gaza’s healthcare system:

... Amy Goodman asked about my previous comments on Emory School of Medicine’s complicity in the genocide in Gaza. I gave the example of our surgery clerkship director who participated in Israel’s war crimes by serving in the IDF in early 2024 and was allowed to return to his teaching position at the institution. What kind of care are patients receiving from doctors who believe in the legitimacy of apartheid, and that some human lives are not as important as others? These physicians are creating a world in which only some people—those who look like them—deserve care and protection ... The medical school administration at Emory suspended me on November 19th, 2024, citing violations of “respect” and “professionalism” due to my interview on

Democracy Now!. I brought attention to an Emory physician-faculty's aiding and abetting a genocide and the destruction of the healthcare system in Gaza. They have attempted to silence my advocacy to end the genocide and U.S. healthcare's complicity in structural violence. But they have failed to scare or silence me.

This op-ed included a hyperlink to the First NSJP and DAG Post, which in turn linked to the defamatory Phone Script and Email Template urging Plaintiff's termination.

- d. On or about February 11, 2025, during the Press Conference hosted by CAIR- Georgia, Mohammad delivered her CAIR Speech, falsely stating:

... I mentioned an unnamed physician who served in the military, actively engaged in the genocidal campaign against the Palestinian people, my people ... Having a physician faculty member who participated in a military convicted of committing genocide against Palestinians makes me feel unsafe. It makes black and brown medical students feel unsafe. It makes black and brown and indigenous patients feel unsafe. I cannot learn from a physician who might have fired one of the 355 bullets that landed in 6 year old Hind Rajab's body. Or who might have helped make the decision to bomb one of the hospitals in Gaza. Or who might have celebrated the murder of our communities on the rubble still wet with Palestinian blood. A doctor who cannot see Palestinians as human beings will return to Atlanta to offer the same disposability to black and brown patients at home.

145. NSJP and DAG jointly published two posts on Instagram, the First NSJP DAG Post and the Second NSJP DAG Post, in which they made the following defamatory statements:

- a. In the First NSJP DAG Post, NSJP and DAG falsely stated that Plaintiff had recently served in the “IOF”, an abbreviation of “Israeli Offense Force,” a deliberately inflammatory mislabeling of the Israeli Defense Forces (IDF), which mischaracterized Plaintiff’s medical service and implied his participation in offensive military operations:

...Umaymah [Mohammad] expressed concern over the silencing of Palestinian voices and alluded to an Emory physician who recently served in the IOF ...

- b. NSJP and DAG also permitted defamatory third-party comments to remain publicly visible in the comments section of the First NSJP DAG Post. These comments explicitly accused Plaintiff of participating in genocide and murder:

- i. @emorymedschool ... How do you justify suspending a Palestinian medical student speaking out about GENOCIDE, while simultaneously condoning a professor of medicine who chooses to participate in that same genocide—one where healthcare workers are specifically targeted?

- ii. Shame on Emory for employing genociders [sic] and murderers, while punishing those who resist annihilation.

- c. The First NSJP DAG Post included a hyperlink to the defamatory Phone Script hosted on the Action Network website, which encouraged readers to contact the School of Medicine’s deans and make false statements about Plaintiff. The Phone Script directed

readers to make the following defamatory statements about Plaintiff to the School of Medicine's deans:

I'm alarmed by the institution's endorsement of faculty like Dr. Joshua Winer, who recently served in the Israeli Defense Forces. Is supporting genocide and war crimes more acceptable at Emory than resisting them? Investigate faculty and students endorsing Israel's apartheid regime and remove them for patient safety and compliance with international demands.

- d. The First NSJP DAG Post also included a hyperlink to the Email Template hosted on the Action Network campaign website, directing readers to send defamatory emails to 41 Emory faculty members. The Email Template falsely asserted that Plaintiff endorsed apartheid and participated in genocide, stating:

...[Mohammad] compared Emory's disgraceful firing of Palestinian physician Dr. Abeer AbouYabis to Dr. Joshua Winer's warm institutional welcome to illustrate a glaring disparity that reflects Emory's longstanding pattern of anti-Palestinian and anti-Muslim racism (further outlined in the Title VI complaint recently filed against Emory).

It is the duty of every healthcare professional to ensure the safety of patients as well as medical students and trainees. How can we feel safe knowing Emory employs and protects physicians like Dr. Joshua Winer who has written openly about his participation in a military campaign that has been condemned as a genocide ...

- e. In the Second NSJP DAG Post, NSJP and DAG again included a hyperlink to the Email Template and Phone Script. Additionally, NSJP and DAG reiterated their false accusations, asserting that any



physician who served in the IDF within the prior sixteen months had perpetuated genocide:

We stand unequivocally with Umaymah and her truthful statements, that any physician-faculty who served in the IDF these last sixteen months perpetuated genocide...

Emory issued several allegations against Umaymah [Mohammad] after she anonymously compared the cases of two faculty of medicine. The comparison was made [between] one Palestinian physician who was terminated in October 2023 for a social media posts about Palestine and another faculty of medicine who was allowed to serve in the IDF during the genocide in early 2024 and resumed teaching at the institution. In her interview, she mentioned that the IDF soldier-physician “aided and abetted a genocide, aided and abetted the destruction [of] the healthcare system in Gaza, and in the murder of over 400 healthcare workers.

Although the IDF soldier and physician was never identified as a result of the interview, despite the IDF soldier and faculty member having published his own op ed for the Times of Israel titled, “An ongoing quest to serve,” in which he proudly identified himself as an IDF reservist ready for deployment to perpetuate genocidal crimes in Gaza...

How can individuals who inflict dismemberment, torture, and slaughter return to their daily routines as medical professionals, claiming to be healers at US healthcare institutions.”

146. AMP founded and maintains control over NSJP, and through this relationship, adopted, enabled, and supported NSJP’s dissemination of false, targeted rhetoric against Plaintiff. AMP’s control over NSJP includes responsibility for its coordinated campaigns against individuals like Plaintiff.

147. On information and belief, WESPAC, as NSJP's fiscal sponsor, knowingly funded and facilitated NSJP's coordinated efforts to vilify Plaintiff and pressure Emory to discipline Plaintiff, including through the distribution of false statements and hyperlinks to defamatory action tools.

148. As a fiscal sponsor, WESPAC receives and administers donations on behalf of NSJP. WESPAC keeps a percentage of the donations and remits the rest to NSJP. This arrangement enables NSJP to collect and distribute funds without transparency. The financial interactions between WESPAC and NSJP are intentionally opaque to largely shield from public view the flow of funds between and among them.

149. A fiscal sponsorship is not a simple pass-through mechanism through which an entity that is not a 501(c)(3) non-profit, such as NSJP, can collect tax deductible donations. The money belongs to and is under the control of the fiscal sponsor who must maintain control over the donated funds and retain sole discretion as to how those funds are spent. Accordingly, money collected by WESPAC and remitted to NSJP must be accounted for, itemized and recorded by the fiscal sponsor, WESPAC.

150. According to IRS Revenue Ruling 68-489, a 501(c)(3) organization is allowed to accept tax-deductible funds on behalf of a non-501(c)(3) entity if the following three conditions are satisfied: (a) The project being carried out by the non-

501(c)(3) organization is “in furtherance of [the 501(c)(3)’s] own exempt purposes”; (b) The 501(c)(3) organization “retains control and discretion as to the use of the funds; (c) The 501(c)(3) organization “maintains records establishing that the funds were used for section 501(c)(3) purposes.” Contributions to a 501(c)(3) which are solicited for a specific project are only deductible under 26 U.S.C § 170 of the IRC in cases where the 501(c)(3) has reviewed and approved the project as being in furtherance of its own tax-exempt purposes. (Rev. Rul. 66-79, 1966-1 C.B. 48.)

151. Thus, Any money accruing to NSJP via WESPAC: (a) is the legal property of WESPAC; (b) must be utilized by NSJP pursuant to WESPAC’s guidance and mission; (c) must be accounted for by NSJP to WESPAC to comply with WESPAC’s compliance requirements as a 501(c)(3) fiscal sponsor; and (d) is subject to audit by relevant authorities including the Internal Revenue Service and relevant states Attorneys General. If WESPAC does not have “general awareness” that the money it transfers to NSJP is used to defame innocent pro-Israel Americans like Dr. Winer, then it cannot be a tax-exempt entity and its 501(c)(3) status should be revoked for failure to comply with the basic requirements of acting as a financial sponsor.

152. WESPAC was acting as fiscal sponsor for NSJP at all relevant times, and fiscal sponsors have a fiduciary duty to the non-profits they sponsor. The IRS requires fiscal sponsors to have “discretion and control” over project funds (Rev.

Rul. 68-489, 1968-2 C.B. 210). Because NSJP does not have a separate legal existence and operates merely as a program of AMP and WESPAC, its fiscal sponsor, its actions (including defamatory speech) are legally the sponsor's actions. Thus, WESPAC knew or should have known what NSJP was doing with the funds it was providing, and NJSP acted as WESPAC's agent within the scope of their relationship.

153. Marya made numerous false and defamatory statements about Plaintiff across various platforms, falsely portraying Plaintiff as a racist genocidal war criminal and an unfit educator. These statements were sometimes accompanied by Plaintiff's name, photograph or hyperlinks that directly identified him. More specifically, Marya made the following defamatory statements:

- a. On or about December 16, 2024, Marya published a post on X that included Plaintiff's name and photograph. In the post, Marya falsely stated Plaintiff returned from serving in a genocide and then instigated a malicious campaign to remove a Palestinian faculty member from the School of Medicine:

Palestinian Hematologist Oncologist Professor fired at Emory in October 2023 for a social media post which was maliciously framed. They silence us here for while they kill us here. The witch hunt this time was by the IDF soldier/medical school professor Joshua Winer at Emory who went to serve a genocide and then return to work at Emory. He's still employed.

Palestinian female [Dr. Abeer AbouYabis] fired for her words uplifting Palestinian resistance to apartheid/occupation while white man IDF soldier serves in Gaza during the genocide and returns to work at Emory. This is what healthcare look like in US universities.

- b. On or about January 3, 2025, Marya self-published an article on Substack titled, “Sick From Genocide,” in which she falsely asserted that medical students are fearful of Plaintiff because of his service in what Marya inaccurately referred to as a “genocide”. Marya included a hyperlink to Plaintiff’s *Times of Israel* op-ed in order to explicitly identify him:

She kept talking. So did I. Then came my suspension for naming that med students were afraid because they didn't know the status of someone on campus who had just come from a genocide zone--did they participate? Military service is mandatory. Med students all over the country are afraid of this, because some of their professors are actually going to serve in the genocide like this professor of surgery at Emory [link to Plaintiff’s *Times of Israel* op-ed], who went to serve in a combat and medic unit during the ongoing genocide. He returned to work as if it was the most normal thing in the world to do. The students who are speaking up are getting hammered too.

- c. On January 14, 2025, Marya used Instagram to direct users to the defamatory Phone Script and Email Template. In her post, she falsely claimed Plaintiff joined the IDF to participate in genocide and was unfit to teach:

Palestinian American medical student Umaymah Mohammad spoke the unspeakable, and now she’s been suspended by

Emory medical school. She called into question why her professor should leave school, go to the IDF to participate in a genocide and return home as if nothing happened to resume his teaching. Support Emory medical student Umaymah Mohammad suspended for her resistance to the genocide of her people. [Link provided to Phone Script and Email Template].

- d. On the same date, Marya directed X users to the defamatory Email

Template and Phone Script:

Support Emory medical student Umaymah Mohammad  
suspended for her resistance to the genocide of her people.  
Here: [bit.ly/emoryno](https://bit.ly/emoryno)

- e. On or about January 18, 2025, Marya published a Substack article titled “*Decolonizing Medicine*”, and on January 26, 2025, the same article—under a different title—was republished by *Common Dreams*. In both versions, Marya included links to the defamatory Phone Script and Email Template and made the following false statements about Plaintiff, portraying him as a racist war criminal unfit to teach:

I am grateful to medical students like Umaymah Mohammad, whose courage shines as she shares her horror that a professor at Emory went to serve a combat unit during the genocide and came back as if everything was perfectly normal. It is not. Genocide is the most intense expression of racism. Dr. Josh Winer at Emory University is not fit for teaching medical students in a pluralistic society, especially not ones whose family is currently being annihilated by Israel. Umaymah was suspended for speaking up about this violation of her safety and civil rights. Her stance is a moral one—and a missing one—in a colonial medical system that



supports genocidal physicians and silences ones who speak up to stop a genocide. The agenda could not be clearer. Please support Umaymah here [link provided to Phone Script and Email Template].

- f. On or about January 18, 2025, Marya posted again on X, linking to the defamatory Email Template and Phone Script and referring to Plaintiff as a genocidal war criminal unfit to treat patients. She further compared Plaintiff to a notorious medical abuser:

Having a genocidal/war criminal for a physician is bad for patient outcomes. We don't have to study it. We can just look at Howard Maibacj, a devout Zionist who injected 2600 imprisoned people (Black/brown) with poison without their informed consent. It's really not good.

- g. On or about January 31, 2025, Marya published an Instagram post that reiterated and disseminated the defamatory statements made by Mohammad about Plaintiff in her *Mondoweiss* op-ed. Marya further falsely claimed that Plaintiff served in a combat unit during a genocide and was therefore unfit to teach:

Emory suspended Palestinian American student Umaymah Mohammad after she publicly spoke about her concern that a professor of surgery went to serve in the IDF in combat unit during the genocide and returned to teach, as if it's totally normal and acceptable. It's not. Physicians should never normalize, endorse or participate in genocide. Genocide is the most egregious expression of racism. Join me in sending a letter of support for Umaymah here! Every voice helps. Please lift yours. [bit.ly/4jbxfgE](https://bit.ly/4jbxfgE) (link to Phone Script and Email Template).

This genocide relies not only on IDF soldiers pulling the

trigger ... What kind of care are medical students learning when these are our mentors and educators? What kind of care are patients receiving from doctors who believe in the legitimacy of apartheid, and that some human lives are not as important as others? (Phone Script and Email Template were linked, thus explicitly identifying Plaintiff)

- h. On or about February 11, 2025, Marya published an Instagram post again directing readers to the defamatory Email Template and Phone Script. She also falsely claimed that Plaintiff had returned from participating in a genocidal military campaign and was unfit to be in a position of authority over Palestinian students. Marya falsely stated that the ICC had deemed the IDF's actions genocidal, despite no such ruling ever being issued:

@emorymedschool has suspended MD/PhD Candidate Umaymah Mohammad for a brilliant interview with Democracy Now in which she asked WHY an Emory physician who volunteered with an IDF combat unit in Gaza and participated in a military campaign that the ICC has deemed an attempt to exterminate an entire people--her people--was allowed to return to Emory School of Medicine and remain in a position of power and authority over Palestinian students like herself as her teacher. Tell Emory you stand with Umaymah! [bit.ly/emoryno](https://bit.ly/emoryno) (link to Phone Script and Email Template).

- i. On or about February 17, 2025, Marya posted a photograph of Plaintiff alongside a defamatory statement accusing him of being a genocidal war criminal who had murdered Arabs for sport and then returned to the School of Medicine to persecute Palestinian doctors

and students:

...There are an estimated 23,000 Americans serving in the IDF, murdering Arabs for sport. When these people come back home, what protection do we have? Studies show that veterans of genocides (i.e. war criminals) can be deeply violent people...Some of them are professors of surgery at places like @EmoryMedicine[.] Dr Josh Weiner has been working hard to push Palestinian doctors and med students out of the university.

- j. On or about February 24, 2025, Marya posted on X falsely stating that Plaintiff's medical license would be revoked due to his service in the IDF:

They've been at my license for 17 months and counting. Funny/not funny thing is that it's doctors who have served in the IDF during a genocide like Dr Josh Weiner at Emory who will get his license revoked. Not those of us who insisted the killing stop.

- k. On or about March 26, 2025, Marya again used Instagram to direct readers to the defamatory Phone Script and Email Template. Additionally, Marya falsely stated that Plaintiff is a genocidal war criminal, an "active" IDF soldier, a foreign military agent, and a danger to medical students and patients:

Support med student Umaymah Mohammad who is experiencing intense racist repression of her speech and her expression of concern for her own safety after publicly sharing her concerns about active IDF as a professor in her medical school. What role should military personnel who actively participate in genocide have in medicine? Should war criminals be welcome to practice medicine in our hospitals? How does that impact the safety of

patients and students? How is it impacting our own Constitutional Rights and Civil Rights to have foreign military agents in our universities driving disciplinary proceedings that suspend and fire us?

154. CAIR-Georgia published, adopted, and disseminated false and defamatory statements concerning Plaintiff, including by republishing content created by others that explicitly defamed Plaintiff and by independently making statements that falsely attributed genocidal conduct and war crimes to him. CAIR-Georgia made the following defamatory statements about Plaintiff:

- a. On or about February 11, 2025, CAIR-Georgia issued a press release on Facebook that included hyperlinks to the defamatory Phone Script, Email Template, and Mohammad's Democracy Now Interview.
- b. On or about February 11, 2025, CAIR-Georgia published Mohammad's defamatory CAIR Speech on its official Facebook page, thereby adopting and further disseminating Mohammad's false and defamatory statements about Plaintiff in which she accused him of engaging in genocidal acts while serving in the IDF.
- c. During the Press Conference, immediately following the defamatory statements Mohammad made about Plaintiff in her CAIR Speech, CAIR-Georgia's executive director falsely stated that Plaintiff's employment at the School of Medicine is indicative of its

institutional complicity in war crimes:

...You just heard from Umaymah Mohammad, an Emory student unjustly suspended from Emory School of Medicine for her advocacy for Palestine. It is evident that at Emory School of Medicine, voicing support for victims of human rights violations is swiftly punished ... [The fact] that faculty and students join support for Israel's perpetration of war crimes is conveniently ignored or covered up.

- d. On or about March 24, 2025, CAIR-Georgia promoted the Guardian Article on its Instagram account alongside its defamatory statement that Plaintiff was complicit in genocide:

Palestinian American student, Umaymah Mohammad, objected to working with an IDF soldier. Emory University unjustly suspended her. CAIR-Georgia will continue to support Umaymah Mohammad as she challenges Emory University and its medical professionals' complicity in the genocide in Gaza.

- e. On or about March 24, 2025, CAIR-Georgia's executive director defamed Plaintiff in a statement she issued to the *Guardian* in support of Mohammad, falsely asserting that Plaintiff used his medical license in furtherance of violence:

You have a Palestinian medical student [Umaymah Mohammad] who specifically joined the field trying to understand inequities and the role of medicine in violence. To have to work side by side with an IDF soldier is exacerbating, and makes it uniquely painful for her.

155. CAIR-Foundation collaborated with CAIR-Georgia on Instagram to adopt and further disseminate false and defamatory statements about Plaintiff

through joint social media posts. On or about February 11, 2025, CAIR-Georgia and CAIR-Foundation collaborated on the CAIR Team Post in which they published the WSB-TV Segment regarding CAIR Georgia's Press Conference. The segment featured a reporter explaining that Mohammad was disciplined following her Democracy Now Interview in which she "directed allegations at an unnamed Emory doctor volunteering with the Israeli army". The news segment then cut to Mohammad's Democracy Now Interview in which she made the following false and defamatory statement about Plaintiff:

This man participated in aiding and abetting a genocide, in aiding and abetting the destruction of the healthcare system in Gaza.

In the comments section of the CAIR Team Post, CAIR-Georgia provided a link to the defamatory Email Template and Phone Script.

156. Emory SJP republished and reinforced the false and defamatory narrative regarding Plaintiff through multiple posts on its Instagram platform, thereby adopting the statements and amplifying the reputational harm Plaintiff incurred:

- a. On or about January 14, 2025, Emory SJP reposted the First NSJP and DAG Post on its Instagram account, thereby adopting and further disseminating the false and reputationally damaging statements made therein about Plaintiff.



- b. On or about February 13, 2025, Emory SJP reiterated the false and defamatory statements that Mohammad made about Plaintiff during her Democracy Now Interview, included a clip of Mohammad making the defamatory statements during the Democracy Now Interview, and then explicitly identified Plaintiff as the IDF soldier to whom Mohammad referred:

During the [Democracy Now!] interview, [Mohammad] referred to an IDF soldier-physician who works at Emory without naming him. She said that this individual, “aided and abetted in a genocide, aided and abetted in the destruction of the healthcare system in Gaza, and in the murder of over 400 healthcare workers, and is now back at Emory, so called teaching medical students and residents how to take care of patients.

This soldier-physician, Dr. Joshua H. Winer, is an Associate Professor in the Division of Surgical Oncology, Department of Surgery at Emory School of Medicine. Dr. Winer discussed his experience of serving in the IDF in a Times of Israel article.

157. On or about March 28, 2025, via Instagram, Emory SJP “welcomed” Plaintiff to the School of Medicine’s so-called “Bloody Hall of Shame.” In the accompanying caption, Emory SJP reiterated false claims that Plaintiff had served in the IDF during the alleged genocide in Gaza and mischaracterized Plaintiff’s writings to support its defamatory assertions:

In the last week, Emory School of Medicine has made national headlines for suspending Palestinian medical student Umaymah Mohammad for critiquing

a faculty of medicine who served in the IDF as it was committing a genocide against Palestinians...

Although Umaymah [Mohammad] never mentioned the name of the IOF soldier-doctor, he wrote an article identifying himself for the Times of Israel in which he says, “I started to volunteer for all positions [in the IDF], military and civilian” – Joshua Winer... On his physician profile, he ... describes himself as a physician with “military combat experience” against Palestinians. (This statement appeared alongside a photograph of Plaintiff against the backdrop of exploding buildings).

158. Defendants made the above statements with the intent to harm Plaintiff’s professional standing and career.

159. Defendants’ false and defamatory statements were especially injurious because Plaintiff is a physician and medical school professor. Defendants stated that Plaintiff engaged in violent, racist, and criminal behavior—attributes wholly incompatible with Plaintiff’s professional and ethical obligations under the Hippocratic Oath and standards of care.

160. Plaintiff is entitled to recover compensatory damages, punitive damages, and all other relief permitted by law.

**COUNT II**  
**All Defendants**  
**False Light Invasion of Privacy Under Georgia Law**

161. Plaintiff repeats and re-alleges paragraphs 25–137 as if set forth fully herein.

162. To state a claim of false light invasion of privacy, a plaintiff must demonstrate that false publicity portrays the plaintiff as something or someone which he is not, and that such a portrayal would be highly offensive to a reasonable person.”

163. In the course of their coordinated campaign against Plaintiff, Defendants published numerous false statements that portrayed Plaintiff as someone who condones or engages in violence, lacks moral integrity, devalues certain human lives, and is unfit to treat patients or teach students—particularly those from marginalized communities.

164. The false statements about Plaintiff—whether authorized and/or directed by WESPAC and AJP, or made directly, adopted and disseminated by the other Defendants through interviews, podcasts, press conferences, social media, or digital publications, were made with actual malice and reckless disregard for the truth. Defendants either knew these statements were false or acted with a high degree of awareness of their probable falsity.

165. These statements presented Plaintiff in a deeply misleading and offensive light, including but not limited to: suggesting that Plaintiff celebrated the killing of civilians, that he was indifferent to the suffering of Black and Brown patients, that he supported apartheid, and that he posed a safety risk to students and patients due to his ethnicity, military service, or religious beliefs.

166. Such portrayals would be highly offensive to a reasonable person and were intended to arouse public outrage, professional condemnation, and reputational harm.

167. Under Georgia law, a false light invasion of privacy claim may be subsumed by a defamation claim where both are based on the same defamatory statements. Accordingly, in the event the Court finds that each of the false statements alleged in this Complaint constitutes defamation per se, Plaintiff's false light claim will be subsumed. However, to the extent any of the challenged statements, in whole or in part, are found not to be defamatory per se—but nonetheless convey a highly offensive and misleading portrayal of Plaintiff to the public, such statements independently support a viable claim for false light invasion of privacy. Plaintiff is entitled to plead alternative and inconsistent theories at the pleading stage under applicable federal law, and therefore pleads false light to preserve all available rights and remedies.

168. As a direct and proximate result of Defendants' false and misleading public portrayals, Plaintiff has suffered significant, ongoing and enduring public embarrassment, emotional distress, and harm to his professional reputation.

169. Plaintiff is entitled to recover compensatory damages, punitive damages, and all other relief permitted by law.

**COUNT III**  
**All Defendants**  
**Civil Conspiracy**

170. Plaintiff repeats and re-alleges paragraphs 25–137 as if set forth fully herein.

171. To recover damages for a civil conspiracy claim under Georgia law, a plaintiff must show that two or more persons, acting in concert, engaged in conduct that constitutes a tort.

172. Here, the Defendants, acting in concert, combined and conspired with one another to defame Plaintiff and to place him in a false light, with the shared unlawful objective of damaging Plaintiff’s professional reputation, pressuring the School of Medicine to reinstate Mohammad, and seeking Plaintiff’s termination and public condemnation.

173. Mohammad initiated this conspiracy by making false, defamatory statements about Plaintiff during the Democracy Now Interview, including that he had participated in genocide, war crimes, and the destruction of Gaza’s healthcare system, despite knowing that Plaintiff served in the IDF in his capacity as a physician. Mohammad ensured that her false statements were widely disseminated by reiterating them on a podcast, at the Press conference, and in her *Mondoweiss* op-eds. Mohammad’s statements were designed to invite widespread public scrutiny, outrage, and retaliation against Plaintiff. Mohammad then conspired with the other

defendants herein to further disseminate and publicize her false and defamatory statements regarding the Plaintiff and place him in a false light.

174. NSJP and DAG, organizations with which Mohammad is affiliated as a steering committee member and co-founder respectively, collaborated to adopt, amplify, and disseminate Mohammad's defamatory statements. They did so through coordinated social media campaigns, including the "First NSJP DAG Post" and the "Second NSJP DAG Post," which contained defamatory statements, directly identified Plaintiff, and linked to call-to-action materials instructing Mohammad's supporters to demand Plaintiff's termination.

175. AMP, as the founder of NSJP, is responsible for enabling, facilitating, authorizing and/or directing NSJP's participation in the conspiracy. Upon information and belief, AMP has organizational control and oversight over NSJP and knowingly authorized its use of official channels and social media to adopt and disseminate false and defamatory statements about Plaintiff.

176. WESPAC, as NSJP's fiscal sponsor, knowingly funded and facilitated NSJP's coordinated campaign to target and exert pressure on Emory University to investigate and terminate Plaintiff. This campaign included the dissemination of false and defamatory statements about Plaintiff, as well as the promotion of online tools, the Email Template and Phone Script, designed to further those defamatory efforts.



177. Marya, a close associate of Mohammad's and co-founder of DAG, joined the conspiracy by repeatedly posting false and inflammatory statements about Plaintiff on social media and in articles, including that Plaintiff is a war criminal that both supports and participated in genocide, and is therefore unfit to teach medical students or treat patients. Marya identified Plaintiff by name and photograph and linked to the same defamatory Email Template and Phone Script circulated by NSJP and DAG.

178. CAIR-Georgia, through its public events and social media platforms, adopted Mohammad's statements and worked with Mohammad to further disseminate her false statements. At the Press Conference held on February 11, 2025, CAIR-Georgia provided Mohammad with a platform to deliver a speech containing further defamatory statements about Plaintiff. Following the event, CAIR Georgia republished the speech and promoted related media coverage, including the Democracy Now interview. CAIR-Georgia also shared the same defamatory Email Template and Phone Script.

179. CAIR-Foundation collaborated with CAIR-Georgia, adopting and disseminating defamatory materials online, including via a joint Instagram post that included direct quotations from Mohammad falsely accusing Plaintiff of participating in genocide, as well as the Email Template and Phone Script.

180. Emory SJP, a local chapter of NSJP, joined in the conspiracy by reposting the NSJP and DAG materials, explicitly naming Plaintiff as the physician referenced in Mohammad's Democracy Now Interview, and creating additional posts characterizing Plaintiff as a perpetrator of genocide and a threat to students and patients of color. Upon information and belief, Mohammad is an active member of Emory SJP. Her membership in Emory SJP, combined with the organization's repeated adoption and dissemination of her defamatory statements demonstrates the coordinated and collective nature of the conspiracy among them.

181. Each Defendant took overt acts in furtherance of the conspiracy to defame Plaintiff and place him in a false light, including but not limited to authorizing, directing, and/or participating in publishing defamatory statements, adopting and amplifying false narratives through coordinated social media posts, promoting public campaigns targeting Plaintiff, and pressuring the School of Medicine to act against Plaintiff under false pretenses.

182. Defendants acted intentionally and with actual malice by authorizing, directing, adopting, and/or participating in the publication and dissemination of false statements that directly impugned Plaintiff's professional integrity, fitness, and conduct as a physician and educator.

183. These statements are defamatory per se because they falsely accused Plaintiff of participating in genocide, war crimes, and racial discrimination, and were calculated to injure Plaintiff in his trade, profession, and occupation.

184. In addition, Defendants conspired to place Plaintiff in a false light before the public by knowingly or recklessly attributing to him false and highly offensive conduct, thereby portraying him as morally depraved and professionally dangerous. This portrayal would be highly objectionable to a reasonable person and was intended to subject Plaintiff to public scorn, ridicule, and professional ostracization.

185. As a direct and proximate result of the Defendants' civil conspiracy, Plaintiff has suffered significant, ongoing and enduring public embarrassment, emotional distress, and harm to his professional reputation.

186. Plaintiff is entitled to recover compensatory damages, punitive damages, and all other relief permitted by law.

**COUNT IV**  
**All Defendants**  
**Conspiracy to Interfere with Civil Rights under 42 U.S.C. § 1985(3)**

187. Plaintiff repeats and re-alleges paragraphs 25–137 as if set forth fully herein.

188. Section 1985 of the Ku Klux Klan Act provides that “[i]f two or more persons in any State or Territory conspire ... for the purpose of depriving, either

directly or indirectly, any person or class of persons of the equal protection of the law, or of equal privileges and immunities under the laws ... the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.” 42 U.S.C. § 1985(3).

189. Defendants plotted, coordinated, and executed a common plan to deprive Plaintiff of the equal protection of the laws and his rights and privileges on account of his Jewish identity and/or Zionist beliefs, including his “right in every state to make and enforce contracts” on the same terms “as is enjoyed by white citizens,” 42 U.S.C. § 1981, his right to be free from employment discrimination on the basis of “race . . . religion . . . or national origin,” 42 U.S.C. § 2000e-2(a)(1), and his right not to be “subjected to discrimination under any program or activity receiving Federal financial assistance” “on the ground of race . . . or national origin,” 42 U.S.C. § 2000d.

190. Defendants undertook a coordinated effort to interfere with Plaintiff’s rights by publicly demanding that Emory investigate and/or terminate his employment because of their false accusations that he is a war criminal who participated in a genocide, that he participated in the destruction of the Gazan healthcare system, and that he is a racist who believes in apartheid.

191. The false accusations that Plaintiff supports apartheid and participated in genocide and war crimes were not predicated on any allegation of professional or

any other misconduct, let alone a truthful allegation, but rather on Plaintiff's lawful military service and his expressed sense of duty to serve the Jewish homeland, which is integral to his racial identity as a Jew.

192. In falsely framing Zionism as a colonial, racialized ideology tantamount to apartheid and genocide, Defendants supplied the ideological foundation for the conspiracy to deprive Plaintiff of his rights based solely on his association with Zionism, which is an integral part of Jewish identity for a very significant number of Jews.

193. By targeting Plaintiff for expressing his Zionism, Defendants sought to punish and deter him for his Jewish identity by inducing Emory to terminate his employment on that basis, a result that would violate Titles VI and VII of the Civil Rights Act, as well as 42 U.S.C. § 1981.

194. In addition, Defendant CAIR-Foundation receives federal funding, making their conduct in subjecting Plaintiff to discrimination "on the ground[s]" of his "race" and "national origin" a violation of Title VI of the Civil Rights Act. 42 U.S.C. § 2000d. On information and belief, those defendants who do not operate a "program or activity receiving Federal financial assistance" conspired with those who did to deprive Plaintiff of his rights under Title VI.

195. In furtherance of this conspiracy, Defendants engaged in numerous overt acts, including but not limited to authorizing, directing and/or participating in the:

- a. publishing of knowingly false and defamatory statements accusing Plaintiff of genocide, war crimes, and posing a danger to “black and brown” students and patients due to his racial Jewish identity; and
- b. organizing public campaigns and social media efforts that explicitly demanded Plaintiff’s termination or investigation;
- c. disseminating Plaintiff’s name, photograph, and professional title to encourage public targeting and institutional discipline;
- d. circulating coordinated mass-email and phone campaigns pressuring Emory to launch an investigation against Plaintiff or terminate his employment on the basis of his protected identity, speech, and affiliation.

196. Through these acts, Defendants sought to:

- a. interfere with Plaintiff’s employment with Emory as a physician and educator by, *inter alia*, fostering distrust, disrespect, and doubt among his students through repeated defamatory statements falsely alleging that he had participated in war crimes in order to coerce Emory into terminating his employment in violation of Title VI,



Title VII, and 42 U.S.C. § 1981;

- b. discriminate against Plaintiff on the basis of his race in the administration of CAIR-Foundation’s “program or activit[ies] receiving Federal financial assistance,” 42 U.S.C. § 2000d. .

197. Defendants’ actions were intended to deprive Plaintiff of the same rights and privileges afforded to others. Defendants’ campaign was premised on the notion that individuals affiliated with Zionism are inherently complicit in apartheid, a crime against humanity, and that anyone affiliated in any way with the IDF, a Zionist military, is complicit in acts of genocide, ethnic cleansing, and colonial violence, and thus undeserving of equal access to employment.

198. Defendants’ actions constitute a racially motivated conspiracy to deprive Plaintiff of the equal protection of the laws, or of equal privileges and immunities under the laws. Defendants’ conduct is neither lawful dissent nor protected opinion — it is targeted, discriminatory, and coercive conduct aimed at excluding a member of a protected class from public and professional life.

199. As a direct and proximate result of Defendants’ conspiracy and the acts committed in furtherance thereof, Plaintiff has suffered significant harm, including reputational damage, emotional distress, fear for his safety, economic injury, and impairment of his constitutional rights.

200. Defendants acted maliciously, willfully, and with reckless disregard for

Plaintiff's rights, entitling Plaintiff to compensatory damages, punitive damages, and all other relief permitted by law.

**JURY TRIAL DEMANDED**

Plaintiff hereby demands a jury trial for all issues so triable.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests the following relief as against the Defendants:

- A. Award compensatory damages in an amount to be determined at trial;
- B. Award punitive damages in an amount to be determined at trial;
- C. Declare that the statements authorized and published by Defendants identified within this complaint, individually and collectively, were and are false;
- D. Award Nominal Damages;
- E. Grant injunctive relief requiring Defendants to remove their false and defamatory statements about Plaintiff from any website and/or social media accounts under their control;
- F. Grant injunctive relief enjoining Defendants and anyone acting in privity with the Defendants from further engaging in the torts of defamation and false light;
- G. Disbursements, costs and attorneys' fees; and

H. For such other further relief to this Court may seem just and proper.

Dated: September 15, 2025

Respectfully Submitted,

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# **EXHIBIT A**

## Fwd: Palestinian Blood Stains Your Hands, Emory University and School of Medicine

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**From:** Mohammad, Umaymah [u.k.mohammad@EMORY.EDU](mailto:u.k.mohammad@EMORY.EDU)

**To:** MD2024-TALK@LISTSERV.CC.EMORY.EDU

**Date:** Wed, Jan 17, 2024, 8:10 AM

As you all celebrated the holidays and New Year in the warmth of your homes, holding your families in safety and security, [over 30,000 Palestinians](#) were murdered before they could see 2024. [Over 10,000 of them children](#).

Murdered, thanks to us, of course. For without the complicity of U.S. tax dollars, or without our silence (which equates consent), the ongoing genocide of the Palestinians since 1948 would never have been possible. And your silence is deafening.

You have had more than three months, more than 100 days, to say something, anything, on behalf of the Palestinians. You have chosen not to. And this choice has made you complicit in our genocide. Palestinian blood is on your hands, every single one of you, at Emory University and School of Medicine.

Since October 7<sup>th</sup>, 2023, Israel, with the backing of the U.S. and using bombs made in the U.S. and our tax dollars, has:

- Slaughtered more than [30,000 Palestinians](#) (10,000+ of which are children) in Gaza (as per the Euro Med Human Rights Monitor and reported on by the UN Office for the Coordination of Humanitarian Affairs). We are not just numbers! [Here](#) is an instagram account dedicated to naming and sharing the life of as many martyrs as possible (or look up [@palestinianmartyrs](#))
  - [Israel is murdering approximately 250 Palestinians a day](#)
- [Displaced 1.9 million Palestinians in Gaza](#) (85% of the population)
- Dropped more than [65,000 tons of explosives on the Gaza Strip](#) (a tiny strip of land 25 miles long). This is equivalent to three nuclear bombs we disgustingly dropped on Hiroshima in WW2.
- Murdered more than [79 journalists](#) (other reports say [over 100](#), which is a record number of journalists killed in any single instance). This is of course deliberate—Israel is attempting to murder anyone who is sharing the truth with the world.
  - Journalists are supposed to be off-limits as per international law
  - Israel has deliberately targeted the families of these journalists with the intention of forcing them to stop their reporting. One such journalist is [Wael El-Dahdouh](#), Al Jazeera's Gaza correspondent, who has [lost his wife](#), and now three of his children, due to Israel's deliberate targeting of his family in the last few weeks. He continues to report on Israel's war crimes, a testament to the steadfastness and resilience of the Palestinian people. He is called the Mountain of Palestine.



- Demolished residential buildings and all other infrastructure. As of the end of 2023, [300,000 homes in Gaza have been destroyed](#) (nearly 70% of homes)

But “health isn’t political”! Oh, really? In the land of health disparities? Being silent is a political stance. Choosing not to stand up on behalf of the Palestinians is a political stance (that stance is a consent and support for our genocide). Choosing to stay silent in the face of oppression and repression is a political stance that supports the status quo. Silence is a political stance.

For those so ignorant and hardened that numbers do not move them, let me [show you what genocide looks like](#). Let me [show you what you have paid for with your silence and your tax dollars](#):

- Have you ever seen a [child dug out from under the rubble](#)? Or a [family of sleeping children bombed](#)?
- Have you ever seen what [white phosphorus does to a child](#)?
- Have you ever seen a [child collect what is left of his family after they were bombed](#)?
- [Have you seen someone change a child’s bandage over a limb amputation without morphine](#)?
- Have you [seen a father, who left his home to bring his hungry child a cookie with the little money he had, come home to find that his home, and his children in it, were bombed](#)?
- (You can see first-hand what genocide looks like by the young and resilience journalists in Gaza who are documenting it. Visit the following Instagram accounts to see what it is exactly you are paying for: [@motaz\\_azaiza](#), [@wizard\\_bisan1](#), [@wael\\_eldahdouh](#), [@mohammedasad.84](#), [@mohammed\\_awad89](#), [@mariam\\_abu\\_dagga](#), [@solimanhijjy](#), [@lama\\_jamous9](#), [@amr.tabash](#), [@hamdaneldahdouh](#), [@a7mhisham](#))

You built this world. You bombed that home. That child is dead because of us. None of this could have happened without the support of the U.S. Without your silence and without the silence of Emory University and its School of Medicine.

And for those who see brown and black people as disposable (your actions show me that, well, almost all of you do), perhaps you would be more inclined to care about your peers—physicians and nurses and paramedics. What an empty promise, Emory, you give to your students, as you preach your “anti-racist” work and your hypocritical words that you care for human life. Your behavior shows otherwise. Here is what Israel has done to deliberately destroy Gaza’s already poor health infrastructure (due to a 16 year siege and blockade) since October 7<sup>th</sup>

- [79 ambulances](#) have been targeted, [many of which had paramedics and patients in them](#)
- [26/36 hospitals](#) in Gaza have been bombed
  - [Israel is bombing hospitals, with hundreds, sometimes thousands, of patients inside](#). Before Al Shifa hospital was bombed (the biggest hospital in Gaza), a nephrologist by the name of Dr. Hammom Alloh was [interviewed by Democracy Now on October 31<sup>st</sup>](#) before he was killed alongside his patients. He was asked by reporters why he did not evacuate the hospital when Israel let them know they were going to bomb it. This was his honorable response, “**And if I go, who treats my patients [patients who are too sick to evacuate]? They are not animals!**”



**They have the right to receive proper healthcare! We can't just leave. You think I went to medical school and for my post graduate degrees for a total of 14 years to think only about my life and not my patients'?! I am asking you, ma'am, you think this is the reason I went to medical school? To think only about my life?"**

§ This is what it means to be a Palestinian physician. He was martyred alongside his patients, refusing to abandon them, while Israeli and US bombs rained on them from above

§ There is no physician at Emory, except the Palestinian physician who was wrongfully suspended recently, who is half the physician he was. Glory to him, who is alive in heaven, watching what we do with his example. What will you do?

- 300 healthcare workers have been murdered by Israeli and US bombs
- Since January 8<sup>th</sup>, more than 600 healthcare workers and patients have gone missing from Al Aqsa hospital (one of the last functioning, and that is a generous word, hospitals in Gaza) due to forced expulsion by the Israeli military. Their locations still remain unknown, and it is unknown how many of them have been murdered.
- There are no more medicines left in Gaza. It was already difficult to obtain necessary medical tools due to the siege on Gaza, and now doctors are forced to operate, amputate, and treat without necessary morphine and painkillers.
- Here you will find the Instagram accounts of some of the physicians in Gaza who are documenting first hand these conditions: @dr.g Hassan.as, @dr.ahmed.moghrabi, @mohammedharar2)

*All you physicians at Emory, medical students at Emory, your acceptance of our murder defines your moral compass (or rather, lack thereof). Your silencing of Palestinian physicians who speak up and resist this genocide are a testament that you are indeed on the side of colonization, white supremacy, ethnic cleansing, and apartheid. That is what Emory SOM represents. Make no mistake, Palestinians will remember this and all those on the side of justice will remember.*

For those who think this all started on October 7<sup>th</sup>, then you have no idea the plight of the Palestinians. The ongoing ethnic cleansing, forced exile, mass murder, and collective punishment of the Palestinians began in 1948 with the Nakba, the year European powers (ahem, the UN) gave consent for Palestine to be colonized by Zionists, which led to the creation of the settler colonial state of apartheid Israel and the expulsion of 750,000 Palestinians (the majority of Palestinians). My own mother was forced to walk out of Palestine on foot in 1967 in the Naksa (the second mass exodus of Palestinians, 500,000 more exiled) when Israel illegally occupied the rest of Palestinian land (what we know today as the West Bank and Gaza). Once more we are watching thousands of Palestinians embark on what is another trail of tears. A march of death. Thanks to you. Because of you. Paid for by you.

The Palestinian struggle is a struggle against colonization, against military occupation, against white



supremacy, against land theft, and against apartheid (Israel is a well-documented apartheid state, see this [250+ page Amnesty International report](#)). And if you choose to believe there are two legitimate sides, you are believing that there is a legitimate excuse to colonize and mass murder indigenous people to create a settler colonial state in its place. Sounds familiar, doesn't it? US and Israeli kinship has to do with shared origin stories of ethnic cleansing of indigenous peoples, genocide, and land theft. They are each others' cheerleaders.

And for those whose hearts are stone, who can only find excuses to justify our death, my death, the expulsion of my family, with your non-existent moral clarity, here are some more facts for you.

Gaza has been under brutal siege and blockade by the state of Israel since 2006 as a form of collective punishment. More than 2 million Palestinians live in a small strip of land 25 miles long, one of the most densely populated areas on the planet. Israel's ongoing siege and blockade has subjected Gaza to some of the worst humanitarian conditions of our generation. These were the conditions in Gaza *before October 7<sup>th</sup>*. These statistics and facts show that Israel's intent has *always been* to kill or expel the 2 million Palestinians in Gaza, half of which are *children*. Genocide and ethnic cleansing of the Palestinians was always an essential component of Israel's existence. [This is what Gaza looked like before October 7<sup>th</sup>](#):

- [63% of Gazans were food insecure](#) (or 1.58 million Gazans)
  - For almost a decade and a half Israel has deliberately been [slowly starving Gaza](#). Now, Gaza faces one of the worst man-made, Israeli and US made, famines
- [82% of Gazans lived in poverty](#)
- [95% did not have access to clean water](#)
- If you are 16 years old in Gaza, you are [6 Israeli assaults old](#)
- In 2018, both the WHO and the UN were urgently reporting that by 2020, [Gaza would be unlivable](#). Imagine what it was like in 2021. 2022. 2023?

Israel never let up the siege despite international pressure (by international bodies created by the West, so there's that), or in response to decades of peaceful Palestinian resistance, and Palestinians continued to die from hunger, lack of clean water, and lack of medical supplies under its brutal siege. Israel's hope was that all the almost 2.5 million Palestinians in Gaza would lay down and die, without a peep. That's how I am supposed to act too, right? Watch you all ignore a genocide, and lay down and be murdered with my people, without a peep. [Resistance is justified when people are occupied](#). No justice, no peace. [Palestinians have demonstrated 75 years of peaceful resistance, which was ignored every time](#). Should we lay down and die? That would be more comfortable for you, wouldn't it? To watch me die, alongside my people.

Here are the ways in which you, every single one of you reading this email, are complicit in our genocide.



- The U.S. has provided [unconditional financial and military aid to Israel in the billions for decades](#), despite Israel's war crimes against the Palestinians. Most recently, Biden has [approved 14.3 billion dollars](#) to be sent to Israel for support.
  - And yet, in the US we can't afford free healthcare? Free education? To house our community who is unhoused? To feed our communities who are hungry? To bring our brothers and sisters out of poverty? **No, clearly, we can afford to protect everyone, YOU just choose not to. This is the world YOU built.**
  - The U.S. is the biggest financier of Palestinian colonization, ethnic cleansing, and exile. After Israelis, Americans have the most Palestinian blood on their hands. That's you!
- [Israel has dropped 22,000 American-made bombs on Gazans](#) in the last few months. The U.S. is providing these weapons to its sister colonial state to murder the indigenous Palestinians
- [The United States is the only country on the security council to veto a ceasefire resolution.](#) Humiliating. Where was your dissent? Your cries of anger?
  - Imagine that America is so far right, has normalized genocide and ethnic cleansing so much that it cannot even accept a nonbinding resolution for a ceasefire. This is the country you built. On blood. On death. This is a reflection of you.
- Your lack of condemnation of [Atlanta's COP CITY](#) is a consent to its existence. This is a project that will further militarize Atlanta police, while simultaneously increasing police brutality and destroying our environment. U.S. police forces do not keep black and brown people safe. How are we still having this conversation? This global military complex is directly connected to Palestine—the [weapons used to kill Palestinians are used to kill black and brown people in our city.](#)
- Atlanta police forces have been undergoing "police exchanges" with the IDF (Israeli military) through a [local program called GILEE](#). Ultimately, what is happening is that local police forces and paramedics go to Israel to train under a *military force* to better learn how to murder, surveille, and target black and brown people. Right in our own backyards.

Still don't believe your local Palestinian MD/PhD candidate? Of course you don't! I am just a disposable brown Muslim woman, whose cries for justice are a nuisance to your comfort. No problem. Who knows apartheid, genocide, and murder better than South Africa? On January 11<sup>th</sup> and 12<sup>th</sup>, South Africa brought an [84 page report](#) to the International Court of Justice to charge Israel with genocide. Here is how it went down (I strongly urge you to gather some friends and watch this hearing):

- The first day of the hearing, South Africans presented a strong and soulful indictment against Israel citing an extensive amount of evidence that what Israel has done to Palestinians amounts to genocide. You can watch this part [here](#).
- The second day of the hearing, Israel's weak defense. Imagine yourself defending genocide (that's what those who say "I stand with Israel" are doing). You can watch this sorry excuse [here](#).
- Although the ICJ really doesn't have any power to implement their decision, this case will go down in history. A country that has fought against apartheid and colonization is now rising from the ashes to defend its global siblings who are suffering the same fate. Black South Africans who lived under apartheid grew to become lawyers and judges, and are using what they have built from the ground up to defend the Palestinians and reject Western violence. This is what solidarity looks like! None of us are



free until all of us are free!

Don't believe black South Africans? Of course you don't! Emory School of Medicine doesn't even care about our local black community members. Or any of our deliberately disenfranchised communities. Especially you physicians and medical students who walk on your way to rotations, to work, past our hungry and unhoused brothers and sisters to get Starbucks before your shift. Shame! Or those who stand idly while Atlanta police murder our **black** and **brown** community members. Shame! You who are silent while our city destroys our forests in order to **build a Cop City** that will continue to train police *to get better at* murdering black and brown people. Shame! Shame! Shame!

I am embarrassed to be at an institution like Emory University School of Medicine who not only has been silent about the ethnic cleansing of Palestinians, but has actively participated in silencing Palestinians who speak words of resistance against our genocide. Emory SOM has always been silent in the face of injustice! A place where "care" is conditional—based on your skin color, your religion, your palatability to white supremacy, and how much money you have in your pocket. I really didn't expect anything more than your complicity and your silence. And here it is, loud and clear.

Shame on every single one of you. You will never be able to wash our blood off your hands. We will never, ever forget this.

Still finding excuses as to why Palestinian deserve to be murdered? Do you believe the racist and dehumanizing myths perpetuated by the Western media, who have always historically justified the murdered of black and brown people? *I wish for you what you wish for the Palestinians.* If you believe in liberation, this is a prayer for your benefit, for our collective freedom! If you are of the ones who believe the onslaught is justified, it is a curse. And the prayers of the oppressed are the loudest and closest to God.

**I will never forget your silence on this issue, because I know without a doubt *that if I was that Palestinian under the rubble, not only would you not dig me out, you would have been the one to bomb my home and bury me under it and tell the world that I deserved it.* Rather than condemn the bombing, you would instead send an email saying that both sides deserve mercy and compassion. You are no leaders, no mentors, no teachers of mine. There are no two sides to colonization, ethnic cleansing, or genocide. There is no complexity, no nuance. You are either on the side of the colonizer or the colonized. You have chosen your side.**

I will leave you all with three final thoughts. The first, a harrowing indictment from Reverend Munther Isaac, a Palestinian religious leader in Bethlehem, the birth place of Jesus PBUH (who was, you guessed it, a Palestinian), whose words on Christmas mass a few weeks ago you will never forget:



"Gaza today has become the moral compass of the world. Gaza was hell before October 7<sup>th</sup>, and the world was silent. Should we be surprised at their silence now? If you are not appalled by what is happening in Gaza, if you are not shaken to your core, there is something is wrong with your humanity. And if we as Christians are not outraged by the genocide, by the weaponization of the Bible to justify it, there is something wrong with our Christian witness and we are compromising the credibility of our gospel message. If you fail to call this a genocide, that is on you. It is a sin and a darkness you willingly embrace. I feel sorry for you. We will be okay. Despite the immense blow we have endured, we the Palestinians will recover. We will rise. We will stand up again from the midst of destruction, as we have always done as Palestinians, although this is by far the biggest blow we have received in a long time. But we will be okay. **But for those who are complicit, I feel sorry for you. Will you ever recover from this?** Your charity and your words of shock after the genocide will not make a difference. And I know these words of shock are coming, and I know people will give generously for charity. But your words won't make a difference. Words of regret won't suffice for you. And let me say it, **we will not accept your apology after the genocide. What has been done has been done. I want you to look in the mirror and ask yourself: where was I when Gaza was going through a genocide?"** (you can watch him deliver this sermon on his Instagram @munther\_isaac)

The second point is that Emory is one of many institutions who has systematically targeted and silenced Palestinian students and physicians with *false accusations of anti-Semitism*. Israel has weaponized the true existence of antisemitism, and conflated critique of Israel, or critique of [Zionism](#) (a political ideology that has materially manifested as a colonial project and believes that Israel has a right to displace and murder indigenous Palestinians to create a state) with antisemitism. Emory University has a history of perpetuating this racist myth in order to silence, expel, and fire Palestinians. For instance, last semester our dear president of said university sent an ominous email about "antisemitism" on campus. Do y'all even know what he was rereferring to? He referred to a student protest in which students chanted "Free Palestine" and "From the River to the Sea, Palestine will be Free!". Of course, Western media is the work horse of Israel, and so they falsely report that these are antisemitic statements, when in fact they are *land back statements that indigenous people make globally, including the Palestinians*. What does land back mean? Let's ask indigenous peoples: "[The Land Back movement](#) advocates for a transfer of decision-making power over land to Indigenous communities. The movement does not ask current residents to vacate their homes, but maintains that Indigenous governance is possible, sustainable, and preferred for public lands." And whilst [Israeli government officials are literally making actual genocidal statements against Palestinians](#), institutions like Emory target Palestinians and those in solidarity with false accusations in order to silence our dissent. Deliberating banishing the aforementioned statements that call for total freedom of Palestinians on their lands is a tool used to silence Palestinian resistance. **Palestinian blood stains your hands, Emory University. Our blood stains your hands. Our blood stains your hands. One day, you will be held to reckoning for what you have done to us.**



I know this is a loaded issue, and I do not take antisemitism lightly, and if anyone knows me, they know I have organized profusely for many years with Jewish communities for Palestinian liberation and against antisemitism. Because I take this matter seriously, here I provide a list of resources written by Israeli and Jewish scholars (since, obviously y'all don't believe Palestinians or indigenous people or people of color, etc) on the conflation of anti-Zionism and critique of Israel with antisemitism as a tool to silence Palestinian voices: [here](#), [click this](#), [this too](#), [definitely read this one](#), aaaaand [this](#). I happened to write about this phenomena for one of my final papers last semester, which provides a critical historical and religious perspective—you are welcome to take a look.

The last and third message comes from me, your peer, your community member, a Palestinian in your midst. The majority of Palestinians are Muslims, and our resistance, steadfastness, and overwhelming compassion and spirit of justice rooted in our faith is what has allowed us to survive this colonization for a century. We know our martyrs are not dead, and they watch us alongside our ancestors as we fight for our freedom. **In Islam, whether you are alive or dead has to do with the state of your soul, not your body. For those unmoved and all you find in your heart is excuses to justify our death--woe to you, you whose heart still beats, woe to you, for you are already dead.**

Let it be remembered that the Palestinians never lost! You cannot kill a people who know death is not the end! Our martyrs are not dead! And the Palestinians never bowed their heads, never stopped resisting colonization, occupation, and ethnic cleansing. We have never abandoned our cause, we will not abandon our land, and never will! A better world, a world in which every single one of us is free, is being ushered in, with, or without you.

You may be wondering why this email was sent to everyone and not a targeted few. For one, like I mentioned earlier, Emory has picked on and targeted Palestinians on campus and repeatedly denied their efforts. Two, institutions often get away with structural violence—both implicit and explicit—because they are assumed to have inherent benevolence. However, it is all of our responsibilities to hold our institutions accountable! And they should be held accountable to the people who make them function. Without us, institutions are nothing but empty structures. Three, students are afraid to speak out because of institutional repression—this is a reality, and this is my attempt to show the courage of global resistance efforts by taking the first step in breaking the silence.

**Should I be expelled for this message, since that is clearly the precedent Emory has set, woe to Emory, for you will lose so much more than I will. You will lose whatever pulse is left in this place.**

**And for the students of conscience who have read this, identify yourselves! Separate yourselves from the silence of your institution! Reply "all" to these listservs with statements of solidarity! They can pick us off when we are alone, but they cannot punish us all! The people united can never be defeated!**

Inshallah, towards collective liberation!  
Umaymah

(Linked [here](#) is a resource list for those who want to learn more. Israeli and US crimes against Palestinians have been documented profusely for decades, and today's social media has left us the most horrific first hands account of genocide. **In fact, this is the most well documented genocide in all of history.** You will find what you need in this document to hurry up and join the movement for liberation. We will not wait for freedom any longer. And by the way, for Palestinians to truly be free, everyone else must be free. This is a liberation movement that extends between all the rivers and all the seas. Let's STOP COP CITY while we are at it, house all our community members, fight for free healthcare for all, free Sudan, make sure no one is hungry again, and abolish police and prisons. If I forgot anything, don't worry, it's on the list. Liberation is coming. Unjust empires never last. The people united can never be defeated).



## EXHIBIT B

## 9.b. The SOM Investigation Report



**EMORY**  
UNIVERSITY  
SCHOOL OF  
MEDICINE

**Division of  
Infectious Diseases**

July 8, 2024

J. William Eley, MD, MPH  
Executive associate Dean, Medical Education  
Professor, Department of Hematology and Oncology

Re: Umaymah Mohammad, Code of Conduct Complaint

Dear Dr. Eley:

In response to your request to investigate a complaint of a potential violation of the Emory School of Medicine MD Code of Conduct, I have reviewed a letter from [REDACTED] dated May 1, 2024, an email from [REDACTED] dated May 6, 2024, and a YouTube video and transcript of an interview of Umaymah Mohammad dated April 26, 2024, conducted by Amy Goodman of Democracy Now! I have also reviewed the Emory University School of Medicine Professional Conduct document (last modified: 7/17/2023) that includes Social Media Guidelines for Medical Students and Physicians (adapted from the Social Media Guidelines for the American Medical Student Association [AMSA] and last modified: 7/17/2023), and the Emory University School of Medicine Code of Conduct document (last modified: 7/17/2023).

**Summary of the events leading to the complaint:**

The Democracy Now! story dated April 26, 2024, was entitled “Atlanta Police Violently Arrest Emory Students & Faculty to Clear Gaza Solidarity Encampment.” It included interviews with two Emory faculty members who described their experiences and perspective on the events that took place on the Emory Quad when law enforcement was called in to remove a protest encampment set up in support of Palestinians on Thursday, April 25, 2024. Ms. Mohammad was the third person interviewed for the story and she was introduced as an MD/PhD student at Emory and asked to talk about these protests that she helped organize and why she felt it was so key to take this stand on campus. She expressed strong opinions about institutional repression of speech around Palestine, the events taking place in Gaza, concerns about the healthcare response, and concerns about the Georgia International Law Enforcement Exchange (GILEE) Program. The formal complaint stems from a statement Ms. Mohammad made during the interview that offered an example of what she felt was suppression of Palestinian voices. She made the following statement copied directly from the transcript of the interview:

*“So, a great example of this is very early on to this genocide, in October, Emory fired a Palestinian physician for posting a private social media post on her Facebook in support of the Palestinians. And yet one of the professors of medicine we have at Emory recently went to serve as a volunteer medic in*

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*the Israeli Offense Force and recently came back. This man participated in aiding and abetting a genocide, in aiding and abetting the destruction of the healthcare system in Gaza and the murder of over 400 healthcare workers and is now back at Emory so-called teaching medical students and residents how to take care of patients.”*

In an email communication, [REDACTED], a faculty member in the School of Medicine, expressed serious alarm that, as a dual citizen of Israel and the United States who serves as a reserve doctor in the Israel Defense Force, he was being called out and exposed to harassment. He felt in the setting of the inflammatory language used and the many public comments in response to the YouTube posting speculating on the identity of the Emory Professor, that he and his family were being placed at risk.

#### **Findings:**

Ms. Mohammad has every right to express her opinions about Emory as an institution, the terrible situation in Gaza, the response of healthcare to the situation in Gaza, Israeli-Palestinian relations, and GILEE. Although one might disagree with the language used to express those opinions, I view this speech as consistent with the academic freedoms allowed a member of the University within the Code of Conduct. As stated in the Professional Conduct document, “The tradition of the University as a sanctuary of academic freedom and center of informed discussion in an honored one, to be guarded vigilantly.”

However, I find the formal complaint that Ms. Mohammad’s very specific statement about the Emory faculty member fails to uphold the principles of professionalism and mutual respect has merit and recommend that you proceed to formal charges according to the Conduct Procedures detailed in the SOM Code of Conduct document. The use of inflammatory language (stating that the man participated in aiding and abetting genocide, in aiding and abetting the destruction of the healthcare system in Gaza and the murder of over 400 hundred healthcare workers) directed at an individual faculty member is irresponsible, disrespectful, causes a reasonable apprehension of harm, and exposes the faculty member to public hatred and harassment, all of which appears to be in violation of the Emory Professional Conduct and the Code of Conduct expectations. Although the faculty member was not named in the interview, it is reasonable to expect him to be identified based on the details Ms. Mohammad provided in the interview along with widespread social media information sharing.

This recommendation is based upon the following guidance from the referenced documents.

From the Professional Conduct document:

1. Use of Social Media section, page 1: “In all communications, students are expected to be courteous, respectful, and considerate of others.”
2. AMSA Social Media Guidelines for Medical Students and Physicians, Guidelines for Social Networking, page 2: “Be responsible. Carefully consider content and exercise good judgement as anything you post can have immediate and/or long-term consequences and carry the potential for significant public impact and viral spread of content.”
3. AMSA Social Media Guidelines for Medical Students and Physicians, Guidelines for Social

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Networking, page 2: “Be respectful. Do not use defamatory, vulgar, libelous and potentially inflammatory language...that is disrespectful for any individual or group..”

From the School of Medicine Code of Conduct document:

1. Basic Expectations/Inherent Authority section, page 1: “..the School of Medicine and the University at large assumes high standards of courtesy, integrity, and responsibility in all of its members; that each student is responsible for their conduct...”
2. Prohibited Conduct Section, page 2, general statement: “Each student may be subject to this Code whether misconduct occurs on University premises, at University or School of Medicine sponsored activities, or at any location off-campus when such conduct is brought to the attention of the University or the School of Medicine.”
3. Prohibited Conduct section, page 2, item 2: “Causing physical harm to any person or causing reasonable apprehension of such harm.”
4. Prohibited Conduct section, page 3, item 4: “Engaging in conduct directed at a specific person or persons that seriously alarms or intimidates such person or persons...” “Such conduct may include: explicit or implicit threats, ...making remarks in a public place to a specific person that...expose a person to public hatred”
5. Prohibited Conduct section, page 3, item 6: [Possibly] “Violating the University’s Policy on Equal Opportunity and Discriminatory Harassment.”

Although this was a difficult investigation in the context of highly complex, emotionally charged, and tragic world events, I hope that the Code of Conduct matter can come to a satisfactory conclusion.

Sincerely,



Monica M. Farley, MD  
Jonas A. Shulman Professor of Medicine/Infectious Diseases  
Director, Division of Infectious Disease  
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# EXHIBIT C



# *MANIFEST DESTINY - THE USE OF RELIGION TO JUSTIFY COLONIZATION*

A focus on Palestine and Turtle Island

*Mohammad, Umaymah*

*SOC 534 Religion and Public Health | Final Paper*

**Introduction:**

As we watch the brutal images coming out of Gaza in the most recent and deadly escalation of violence by the Israeli government against the Palestinians, we must ask ourselves how this situation has been allowed to occur. There is no world in which mass violence and ethnic cleansing happen by chance or are part of the natural order—they occur due to the consent of the collective consciousness. How, after decades of promises made by the international community of “never again”, has the world come to accept and even support the ethnic cleansing of the Palestinians? How do political leaders come to say “I stand with Israel” as Israel carpet bombs schools, hospitals, and refugee camps in Gaza (Al Jazeera, 2023).

This paper will seek to answer the aforementioned questions from both a critical historical and religious perspective. The weaponization of religion to promote white supremacist attitudes, colonization, and ethnic cleansing is not a new phenomenon; it is one that everyone living under Western empire is familiar with. Christian manifest destiny was used to justify the genocide of indigenous peoples living in the Americas, attempting to uproot any residue of indigeneity to replace it with the settler colonial project that is the United States of America. Similarly, Zionist Judaism manifest destiny is being used to justify the ethnic cleaning of the Palestinians and the illegal acquisition of their lands in order to replace Palestine with the settler colonial project of apartheid Israel. In this paper, we will look at the parallels of how Christian manifest destiny was used to justify strategies of settler colonization, and how this mirrors the Zionist Judaic project in Palestine. It is no surprise that the U.S. and Israel support one another fiercely, as they both have similar origin stories.

Ultimately, exploration of these parallels will also shed light on the critical relationship between anti-Zionism and antisemitism, Zionism and Judaism, and the ways in which decolonial movements are demonized and targeted. This analysis is not only meant to expose Zionism as a settler colonial project rooted in ideas of manifest destiny, but to contextualize much of the rhetoric, political support, and propaganda coming out of Israel and the U.S.

### **Methods:**

Using a combination of previous literature on the topic, first hand documentation of settler colonial events, first person accounts on the establishment of Zionism, and the works of both Palestinian and Israeli scholars, we will first explore the following topics:

- What is settler colonization? How does religion come to justify this?
- What is manifest destiny? How does religion come into play here?
- What is genocide and ethnic cleansing?

To show the parallels between Christian manifest destiny and Zionist manifest destiny, we will look both into the archives and into today's media narratives to show how religion is used in both phenomenon to justify the colonization of Indigenous peoples and their collective extermination. After identifying how Zionists took on the language of manifest destiny, we will then explore how both the Zionist and American colonial states came to be due to settler colonization and ethnic cleansing. Lastly, we will uncover the grave implications of the parallels of two mighty colonial powers who target, demonize, and criminalize the decolonial movements that have existed in both these landmarks for centuries. These discussions will also help us to understand the relationship between Zionism and Judaism, and consequently, Anti-Zionism and

antisemitism, and how the conflation of the two is a deliberate project of colonial states to suppress dissent and resistance.

### **Settler Colonization – Destroying the Indigenous to Establish Settler Colonies**

Colonization has taken differently nightmarish forms over the centuries, one of them being the deliberate replacement of indigenous society with a settler colony. Settler colonization is a distinct form of colonization that necessitates the removal of indigenous peoples in order to establish a society made specifically for settlers. There are two dimensions that must exist for settler colonization to occur: a negative dimension characterized by the destruction of indigenous society, and a positive dimension characterized by the erection of a settler colonial society on stolen land (Wolfe, 2006). This is distinct from other manifestations of colonial projects in several characteristics. First, unlike other colonial projects in which the colonial agents are sent back and forth to manipulate and extort the targeted population, settler colonizers come with the intention of permanently staying on the lands of the colonized people to establish their own sovereignty and control (Barker & Lowman, n.d.). Another important distinction of settler colonization is in the way decolonization manifests. In the 1940s, decolonizing efforts were forced into the dominant political sphere, such as Gandhi's rejection of British control of India and Nelson Mandela's resistance of apartheid and colonization of South Africa. In these revolutionary struggles, European powers were forced out of the lands by the original peoples and therefore relinquished control of the land. However, settler colonization necessitates the mass decimation of indigenous peoples, leaving them as minorities when previously they were the majority (Gilio-Whitaker, 2020). Decolonial strategies

and movements therefore looks different when the colonizers are unable to pack up and return to a home country. An important parallel between the settler colonial empires, Israel and the U.S., is in the way they have targeted, spoke about, and demonized decolonial movements among their indigenous populations. Since there is no place to “return” to for the settlers on Turtle Island and Palestine, they hold onto their myths about the God-given rights to the land. Without these myths, they have no claims.

Settler colonization, like all forms of colonization are not one time events that occur, but are processes that builds the structure of the society (Wolfe, 2006). That structure is “characterized by relationships of domination and subjugation that become woven throughout the fabric of society and even becomes disguised as paternalistic benevolence” (Gilio-Whitaker, 2020). The characterization of settler colonial structures as “paternalistic benevolence” becomes a very important framework when discussing the use of religion to justify the violence that ensues.

What colonial structures replaced Turtle Island and the indigenous peoples of the Americas? The United States of America, a highly racialized, military police state that has incarcerated more than 20% of the world’s population, despite comprising 5% of peoples (ACLU, n.d.). The U.S. is characterized by its inequity in every institution: education, incarceration, medicine, housing, and has a long history of the targeting and killing of black, brown, and indigenous peoples. There is no United States without the genocide of indigenous people, the enslavement of black folks, or the systematic and structural targeting of black and brown populations. These characterize the intentions of this settler colony.

Similarly, what colonial structure replaced Palestine? Apartheid Israel. Disturbingly so, Israel has blatant characteristics of South African apartheid structures. Hebron, or Al-Khalil, a city in

occupied Palestine, is one of the most obvious examples. Al-Khalil is almost entirely segregated. Palestinians aren't allowed to walk on the same sidewalks as Israelis, they aren't allowed to travel on the same roads, and are victims of settler violence with impunity. In a small city, their movement is heavily restricted, which include 22 checkpoints and 64 physical barriers of various types, which intentionally work to segregate the Palestinians from the settlers. (B'tselem, 2019). This is but one small example of the structure of apartheid Israel has chosen to erect. In a monumental report, Amnesty International published over 200 pages in 2022 documenting Israeli apartheid and its violating of international law. Just a few of the manifestations of this include: a separate set of laws for Palestinians, the deliberate deprivation of social and political rights of Palestinians, the use of mass incarceration and incarceration without charges or trial as a means of control, the discriminatory allocation of resources, the forcible transfer of Palestinians at the will of the settlers and the government, and so much more (Amnesty International, 2022).

In the instances of the U.S. and Israel, their horrifying origin stories are not one and done: these stories are not finished, and characterize every institution in these settler colonies. To separate colonial states from the injustices they have committed is to deny their own narratives, their own justifications, and their own visions. Ultimately, there can be no Israel or the U.S. without these hideous colonial structures, since both were predicted and built on them.

### **Manifest Destiny: Religion as a Tool for Colonial Expansion**

The term "manifest destiny" is attributed to an editor named John Sullivan who first used the term in his essay "Annexation" on the U.S.' right to acquire Texas, written for the 1845 issue



of *The Democratic Review*. In the same year, he used the term to describe the United States' right to acquire Oregon as a right ordained by God, writing that this "claim is by the right of our manifest destiny to overspread and posses the whole of the continent which Providence [God] has given for the development of the great experiment of liberty." He believed that the manifest destiny of America differed in that of Britain's because it embodied God's law. Therefore, manifest destiny is generally understood to be the idea that the "New Americans" were ordained by God to expand their dominion to spread democracy and capitalism, from the Atlantic to the Pacific Ocean. This term encompasses several core beliefs, including expansionism, nationalism, exceptionalism, and oftentimes the idea of racial superiority (Mountjoy, 2009).

Sullivan did not intend the description or process of manifest destiny to be secular: it was deeply rooted in his beliefs on Christian nationalism. In fact, scholars go to say that his manifestation of Protestant Christian nationalism is itself manifest destiny (Wilsey, 2017). For ideas of manifest destiny to take political and military might, settlers need also to convince each other that the indigenous people they want to remove for their domain are subhuman. And religion is often invoked in these notions.

Christianity, especially that derived from Protestant beliefs, was appropriated and used to propagate and justify the core beliefs of manifest destiny: including expansionism, nationalism, exceptionalism, and racial/religious superiority. Religion has been co-opted for political and national gains, leading to "men who thought they were acting in order to accomplish the will of God...are suddenly seen to have been really acting in order that the genius of a particular nationality should be manifested and fostered" (Kedourie, 2000). Andrew Jackson invoked

racial and religious supremacy in the Second Annual Message to Congress in 1830, saying that the removal of indigenous people from their homes would allow settlers to “place a dense and civilized population in large tracts of the country now occupied by a few savage hunters...it will cause them gradually, under the protection of the Government and through the influence of good counsel, to cast off their savage habits and become an interesting, civilized, and Christian community” (Jackson, 1830). After what is considered an extermination of the Pequot in 1637 in which 300 – 400 Pequot men, women, and children were burned alive, a militia leader wrote, “Thus, the Lord was pleased to smite our Enemies in the hinder Parts and to give us their Land for an Inheritance” (Mason, 1736).

The understanding of the expansion of American empire as a God-given manifest destiny is generally accepted by most people nowadays. It is the intention of this work to expose the Zionist movement as having practiced the same methodology, except rather than drawing on Christian Protestant ideals, it drew upon Judaism.

Theodor Herzl, born in 1860 in Budapest, Hungary, is attributed as the founding father of Zionism. Initially, Zionism began as a political strategy for Jewish self-determination as a sort of Jewish national movement. Of course, this also came at a time in which antisemitism was at an all time high, and European nations systematically targeted Jewish populations within their borders. But, what is Zionism? A definition provided by Israel historian Ilan Pappé captures what Zionism was, and what it has become today. He says,

*“According to the Israeli interpretation Zionism was a national liberation movement with a strong socialist past and more recent liberal tendencies that entered its ancient*

*homeland, derelict and empty since the exile of the Jews in Roman times, waiting to be resettled. [However], according to the Palestinian explanation, Zionism was a colonialist movement that penetrated the Palestinian homeland by force, with the wish to colonize the country and with possible expansionist ambitions to penetrate the heart of the Arab world.” (Pappe, 2008)*

Simultaneously, these definitions are true. Zionism began as a national movement for the safety and protection of Jewish people, but what it became was a settler colonial movement that more valued political power than true protection of Jewish peoples globally (this will be explored later in detail). Although not all settler colonial or colonial movement have religious undertones and undertones of racial supremacy, many of them do, including Zionism.

In what ways has Zionism pulled on Judaism to become a manifest destiny, ordained by God? In many historical reports, Herzl himself was referred to by other Jewish and Christian Zionists as the “messiah”. At the first Zionist Congress, Herzl’s presence was described by a Zionist journalist as “...if the Messiah, the son of David, stood before us” (Mordechai, 1914). What Herzl brought to the table in terms of political imagination to Zionism, David Ben-Gurion, the first Prime Minister of Israel, brought in political strategy of Zionism. He concretely nationalized Judaism and Zionism in what he called the Million Plan in 1942, which nationalized particular themes of Judaism such as the sacrifice of Isaac and the uplifting of figures like Nimrod (Ohana et. al., 2017). This plan, which was put into effect several years after the establishment of the settler colony of Israel, was a strategy to relocate millions of European Jews into Palestine.

In an incredible first person account of the first Zionist Congress in 1897, a Jewish scholar writes of the transformation he felt around what Zionism was, and what it was clear to become after this conference. He writes:

*“Now that we have seen these same men, the “practical” men of that day, among the delegates at Basle, crowning the new movement [of a Zionist Jewish statehood] with wreaths, and making game of “practical colonization”—as though they had completely forgotten that the responsibility for what has happened to the colonization work lies not on the work itself, but on them, because they carried it on by crooked methods and turned it from its true purpose, in order to create a great popular movement at a single stroke. At Basle, at Jaffa, I sat solitary among my friends, like a mourner at a wedding feast.” (Ha-Am, 1922).*

The co-optation of Judaism by Zionism is best articulated as, “Zionism is an attempt to take a religion, a culture, and condense it into an ethnic identity in a colonialist context.” (Pappe, 2010). And indeed, this is what was done. Careful watch of the rhetoric coming from Israel renders this co-optation clear and pervasive, beginning from the origins of the settler colony to now. For instance, Meron Benvenisti, the Mayor of Jerusalem from 1971 – 78, said, “As a member of a pioneering youth movement, I myself “made the desert bloom” by uprooting the ancient olive trees of al-Bassa to clear the ground for a banana grove, as required by the planned farming principles of my kibbutz, Rosh Haniqra” (Benvenisti, 2002). This rhetoric is common in Israel. One of Israel’s most prominent Rabbis, Rabbi Ovadia Yosef, a former Chief Rabbi of Israel and one of the spiritual leaders of the Israeli Knesset, has a long history of using religious language to justify the mass violence and discrimination against Palestinians. At a Passover sermon in 2001, Rabbi Yosef called for the annihilation of the Arabs, saying “It is

forbidden to be merciful to them. You must send missiles to them and annihilate them. They are evil and damnable". He has also said, "The Lord shall return the Arabs' deeds on their own heads, waste their seed and exterminate them" (BBC Middle East, 2001). More examples? There are plenty. Earlier in 2023, Israel's prime minister at the time Ben Gvir said, "My right, my wife's, my children's, to roam the roads of Judea and Samaria are more important than the right of movement of the Arabs" (Bateman, 2023). Notice that he uses a biblical term for the West Bank, invoking the religious superiority of himself over what he considered second class citizens (the Arabs). Israel has mashed Judaism with its political project to maintain a settler colonial state. The blurring of these lines are dangerous and deliberate, and have led to a sort of Zionist Judaic manifest destiny used to justify the extermination of the natives on this side of the world. Just as we critique the use of Christian manifest destiny to do the same, this is no way a critique that is inherent to any religion, not to any people. This is a critique of a deliberate strategy used by empires to convince settlers of their superiority and right to violence, and as a way to crush dissent using religious undertones.

### **Ethnic Cleansing and Elimination as Strategy of Settler Colonization**

The first of the strategies of settler colonization fall under the negative dimension: the removal of indigenous people from the land. The strategies used to do this include: 1) Ethnic cleansing/ genocide 2) The destruction of homes and creation of mass dispossession and 3) The removal of infrastructure, including medical, education, and others.

According to the U.N. Convention of the Prevention and Punishment of the Crime of Genocide, Article 2, genocide consists of two components:

- “*A mental element*: the "intent to destroy, in whole or in part, a national, ethnical, racial or religious group, as such"; and
- *A physical element*, which includes the following five acts, enumerated exhaustively:
  - Killing members of the group
  - Causing serious bodily or mental harm to members of the group
  - Deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or in part
  - Imposing measures intended to prevent births within the group
  - Forcibly transferring children of the group to another group”

Without question, both the United States and Israel have committed, on mass scale, each and every one of these points, and the evidence is documented. Although we will not prove each point individually in this paper, we will explore, generally, how settler colonial states resort to ethnic cleansing and genocide to accomplish the negative dimension of their projects.

#### The Mental Element of Genocide

This is often the most difficult to prove in international court, but one can assume much about the intention of governments/political organizations who do not even bother to hide their atrocities. What has been done to Gaza over the last several decades is a prime example of the true intent of Israel. According to a United Nations report in 2018, Gaza was already unlivable (United Nations, 2018). Before the most recent escalation of violence on October 7, 2023 in Gaza, the picture of life in Gaza was hardly survivable, made that way by the siege on Gaza imposed by Israel in 2007. This illegal siege was made to starve and poison the two million Palestinians, half of which are children, who live in Gaza. The “justification” of keeping food,



clean water, appropriate medical supplies, out of Gaza, was meant to be a response to Hamas' rise to power in Gaza. But what the siege did was create a humanitarian crisis that leaves Palestinian children dying from lack of medical treatment due to the blockade. Before 2023, this is what Gaza looked like: 63% are food insecure or 1.58 million Gazans (World Food Programme, 2023), 82% live in poverty, 95% don't have direct access to clean water (UNRWA, 2023), and 47% are children (Awad, 2022). These statistics are evidence that the might of Israel is not used for targeted strikes, but as a means to dispossess an entire people. This is the textbook definition of collective punishment, with the intention of eliminating the 2 million Palestinians living in Gaza through colonial control of all basic needs for survival. Without a shadow of a doubt, the intention of Israel has been clear. And the same strategies of collective punishment of Israel has been deployed once again, now, in Israel's sixth military offensive on Gaza since 2007.

#### The Physical Element of Genocide

Most of those who picture genocide picture the physical manifestations of collective violence. The mass murder of the indigenous peoples is part of the settler colonial plan. And, as is the argument of this paper, religious discourse is often used to justify collective violence.

The most recent report from Euro-Med Human Rights Monitor to the United Nations documents the ethnic cleansing and mass punishment of the Palestinians since October 7, 2023. These are the most recent numbers between October 7<sup>th</sup>, 2023 and December 11<sup>th</sup>, 2023:

- 24,142 Palestinians have been martyred (9420 of which are children)
- 48,901 Palestinians have been injured
- 1, 840,000 Palestinians displaced (that is about 95% of Gaza)

- 81 Palestinian journalists have been martyred
- 214 medical staff have been killed, and 247 have been injured
- 131 health facilities have been targeted by bombs (21 hospitals, 56 clinics, and 51 ambulances)
- 62,840 homes completely destroyed, almost 200,000 partially destroyed
- Just in the month of October, 25,000 tons of explosives have been dropped on Gaza, a tiny strip of land a few miles by a few miles. This is 1.5 times the explosive force of the U.S. dropped bombs on Hiroshima.

Just by looking at the actions of Israel in the last two months, these behaviors are textbook definition of genocide and ethnic cleaning as defined by the United Nations. This doesn't include the 75 years of Zionist violence against the Palestinians, which reveal even more harrowing numbers, stories, and strategies. These human rights violations are heavily documented and readily accessible.

Although it is difficult to know just how many indigenous people lived on Turtle Island before colonizers came to take it, scholars estimate that it was between 43 – 145 million peoples. By 1800, only about 600,000 indigenous peoples' hearts still beat under colonial rule. By 1900, only 237,000 indigenous souls remained on their land. (Smith, 2017). Indigenous people did not disappear by themselves—colonial tactics such as mass murder, land theft, spread of disease, and genocide left just a fraction of the hands that tended this beautiful country for centuries. The resilience of these people, who despite this massive genocide, have grown their communities to approximately 70 million Indigenous peoples in the Western

hemisphere, is a testament to the strength of indigenous peoples worldwide, and offers a glimmer of hope for the millions of Palestinians searching for it.

### **Does Zionism and Apartheid Israel really Protect Jewish People?**

This brings us back to one of the original questions in the paper: how do people come to support genocide, as the one committed by Israel against the Palestinians? The assumption being made when all critique of Israel is considered antisemitic is that it must be “pro-Jewish” to be “pro-Israel”. Sounds convenient as a strategy to silence dissent, no? As a result, those who wish to support the self-determination and national struggles of the Jewish people ultimately support Israel. Now, if supporting Israel truly was a sign of one’s support of Jewish people, then the expectation would be that Israel genuinely targets people who express anti-Jewish rhetoric, not just Palestinians asking for freedom.

Ironically, Israel celebrates, touts, and uplifts people who clearly hold antisemitic views as long as they support the state of Israel. This puts into question if Zionism is really a movement to protect Jewish people. In the most recent March for Israel in D.C. on November 14<sup>th</sup>, 2023, organized by the Conference of Presidents of Major American Jewish Organizations, U.S. pastor John Hagee was invited to speak. John Hagee is a prominent American pastor and TV evangelist. He is also the founder and chairman of Christians United for Israel. Now, Hagee is also an out-spoken antisemite and has previously said that Hitler was born from “accursed, genocidally murderous half-breed Jews” and that Hitler was sent by God to help Jewish people reach the promised land (Tamkin, 2023). Ironical, given that the March for Israel was supposedly to stand against antisemitism. Is Hagee really an ally of Jewish people, or is he an ally to the

government of Israel and Benjamin Netanyahu? Are the two one in the same? The answer, clearly in these instances, is *no*.

This is not a rare or one off event, either. When Trump chose Steven Bannon as his chief White House strategist in 2016, many organizations condemned the decision due to Bannon's history of antisemitic and white supremacist views through Breitbart News. However, he also held very pro-Israeli and pro-Likud (far right Israeli political group) views. Therefore, the response from the Jewish community was divided on his appointment: whereas groups focused on justice and civil liberties critiqued the decision, he was also invited to speak at the annual gala as an honored guest of the Zionist Organization of America (Marantz, 2016). Apparently, Zionism will still accept you as an antisemite as long as you support Israel.

Another one? Earlier in 2023, U.S. presidential candidate Robert Kennedy Jr repeated racist and antisemitic myths that Covid-19 was planned by Jewish and Chinese people. When he was confronted, he responded by lashing out at other government representatives who critique Israel. Naturally, a few weeks later, he was rewarded with an op-ed in the *Jewish Journal* that was titled, "RFK is an Ally, not an Antisemite", due to his unwavering commitment to Israel.

In conclusion, we continue to see that real and devastating antisemitism is being excused as long as one supports Zionism and the state of Israel. Even apparent pro-Jewish organizations like the Anti-Defamation League (ADL), "have made it clear that one can only go so far in criticizing the actions of the Israeli state before that critique can be dismissed as antisemitism—that some hand-wringing over settler violence in the West Bank is permitted, but that anything beyond that is in the danger zone of [antisemitic] hate speech" (Wolfson, 2023). Therefore, it must mean that Zionism and support for the Israeli government does not have the

true intention of protecting and advocating for Jewish people, and *that pro-Zionist institutions do not work to thwart antisemitism but anti-Israelism*. It seems then that Zionism is not Judaism, and vice versa.

### **Conflation of Antisemitism with Anti-Zionism – Who Loses?**

If Zionism is not Judaism or equivalent to the Jewish people, *then anti-Zionism is NOT antisemitism*. Then why are the two so heavily conflated? This returns us to the main argument of the paper, in that religion is being invoked to maintain and protect the settler colony of Israel.

According to Jewish liberation organization, Jewish Voice for Peace, anti-Zionism is defined as:

*“Being an anti-Zionist means opposing the political ideology of Zionism, which resulted in the expulsion of 750,000 Indigenous Palestinians from their land and homes. It means standing against the creation of a nation-state with exclusive rights for Jews above others on the land. Anti-Zionism supports liberation and justice for the Palestinian people, including their right to return to their homes and land. Anti-Zionists believe in a future where all people on the land live in freedom, safety and equality.*

*Zionism suggests Jews require a supremacist nation state to answer the real question of Jewish safety. We believe that everywhere in the world, Jews belong and should be safe. Real safety does not grow from guns, checkpoints, walls and a police state. True safety is built through forging real solidarity with all those fighting for a more liberated world.”*

The deliberate conflation of anti-Zionism with antisemitism is used to crush any critique of the settler state of Israel under the guise that critique of this state calls for harm against Jewish

people. Even though, overwhelming, the evidence shows us that this is not true. And yet, this insidious conflation has been slowly working its way into the legal system. The International Holocaust Remembrance Alliance (IHRA) has defined anti-Zionism as a component of antisemitism by stating that “manifestations [of antisemitism] might include the targeting of the state of Israel, conceived as a Jewish collectivity”, and this definition has been adopted internationally by states, organizations, and legal frameworks (Wolfson, 2023). In fact, the U.S. State Department has adopted this definition, and expands on it by stating that these antisemitic acts (which conflate antizionism with antisemitism) are criminal. The implications for Palestinians, Jewish people, and all those who stand as Anti-Zionists to resist settler colonization and violence against the Palestinians have faced grave consequences due to this adoption.

This is a clear strategy to silence and criminalize Palestinians who resist the colonization of their lands. These targeted strategies are endless. Personally, I was almost expelled from my previous university for hosting an event on the detention of Palestinian children by Israel (Israel is the only country in the world *that tries children as young as 11 and 12 in military court*) because I was attacked by local Zionists who claimed that the event was antisemitic, despite the fact that I had made and hosted the event with my Jewish comrades. I have known Palestinian students who have had to transfer universities due to the violence that ensues from their Palestinian advocacy, who have gotten rape and death threats from peers on campus due to their activism, and much more. There are notorious websites, which I will not name as not to increase traffic to these deplorable projects, that post pictures, address, emails, and contacts of Palestinian activists with racist and Islamophobic defamatory commentary, claiming these organizers are anti-sematic. These websites are powered by Zionist thought and hatred toward



Palestinians, and have created a world in which being a Palestinian or an advocate can prevent you from landing a job, from getting accepted in colleges/schools/programs, or can even get you killed. These incidents are extensively documented by a legal and civil rights organization called Palestine Legal, but in no ways does it contain all incidents. Most of these attacks go unaddressed by universities and institutions, leaving Palestinians and our allies to fend for ourselves.

This conflation doesn't just create a world in which Palestinians and those standing in solidarity with Palestinians lose, but Jewish communities lose as well. Many anti-Zionist Jewish people are targeted and exiled for speaking out against apartheid Israel. For example, the Anti-Defamation League has targeted the Jewish liberation organization Jewish Voice for Peace for many years, calling them "antisemitic" and saying that, "The spread of JVP's most inflammatory ideas [anti-Zionism] can help give rise to antisemitism". I have organized in solidarity with Jewish communities for over ten years now, and I have heard the harrowing stories of my Jewish allies whose families have isolated them for their views on Israel, who have been called "fake Jews" by their own communities, and many who no longer are welcomed into their synagogues due to being an Anti-Zionist. This detrimental conflation doesn't just harm Palestinians, but isolates, targeted, and delegitimizes the legacy of Jewish people who refuse to accept that a Jewish liberation is predicated on the genocide of the Palestinians, and who say, despite the pushback "not in our name!".

Lastly, the conflation delegitimizes all resistance movements as "terrorist" or "antisemitic". For example, the historic Boycott, Divestment, and sanctions movement – a peaceful boycott movement that seeks to put financial pressure on Israel to end the colonial

violence against Palestinians, modeled after the boycott movements that resisted South African apartheid—is deemed again and again as antisemitic. There are no true basis for these claims, except that they are meant to terrify anyone who wants to learn about Palestinian liberation and decolonization, and to attempt to defame those who stand for collective liberation.

### **Conclusion**

The role of the academic should always be to create a world in which we are all safe, a world in which we reject all manifestations of structural violence, and to create the counter narratives that will liberate us. By providing an extensive look into how Zionism, which began as a Jewish movement for self-determination, became a manifest destiny settler colonial project, I offer a critical historical and religious perspective that can help us understand how mass violence against Palestinians has been legitimized and made palatable to the world. This study is meant to challenge the dominant narratives that are offered up by Western empire, and to use the following questions to interrogate these narratives. Who benefits, when any critique of Israel is considered antisemitic? Who benefits from the criminalization of Palestinian activists in the West? Who benefits when the entire West is too mortified of standing up for Palestine due to the fear of being defamed as antisemitic?

The only goal of any of my work is to bring us, all of us, between all the rivers and all the seas, freedom. Palestine has become the true litmus test to distinguish between those who genuinely believe in collective liberation, and those who tap in and out of justice movements as it benefits them. Palestine has also become the litmus test for who critically engages with the world, and who openly swallows and accept the lies perpetuated by Western colonial settler states whose sole purpose is to maintain the settler colony.

I want all academics to leave this work by asking themselves this final question:

***what would my litmus test on Palestine say about me?***

*“Oppressors are history’s most predictable gaslighters. Be sure to interrogate their narratives with your very soul. Your freedom, and humanity’s, depends on it.” Dr. Jaiya John*

### Citations

ACLU. (n.d.). Mass Incarceration. *American civil Liberties Union*.

<https://www.aclu.org/issues/smart-justice/mass-incarceration>

Aljazeera. (Nov 19, 2023). ‘Horrific’ : Dozens reported killed in Israeli attacks on camps, schools. Al Jazeera News Network. November 19, 2023.

<https://www.aljazeera.com/news/2023/11/19/horrifying-dozens-reported-killed-in-israeli-attacks-on-camps-schools>

Amnesty International. (2022). Israel’s apartheid against Palestinians: Cruel system of domination and crime against humanity. *Amnesty International*.

<https://www.amnesty.org/en/documents/mde15/5141/2022/en/>

Amnesty International. (2023). *Israel must lift illegal and inhumane blockade on Gaza as power plant runs out of fuel*. Amnesty International.

<https://www.amnesty.org/en/latest/news/2023/10/israel-opt-israel-must-lift-illegal-and-inhumane-blockade-on-gaza-as-power-plant-runs-out-of-fuel/>

Awad, O. (2022). *Palestinian children’s situation on the Occasion of the Palestinian Child Day*.

Palestinian Central Bureau of Statistics. <https://pcbs.gov.ps/post.aspx?lang=en&ItemID=4213>

Barker, A.J., and Lowman, E.B. *Settler Colonialism*. Global Social Theory.

<https://globalsocialtheory.org/concepts/settler-colonialism/>

Bateman, T. (2023). US condemns Israeli minister Ben Gvir’s ‘inflammatory’ Palestinian comments. *The BBC*.

<https://www.bbc.com/news/world-middle-east-66614459>

BBC Middle East. (April, 2001). Rabbi calls for annihilation of Arabs. *BBC News*.

[http://news.bbc.co.uk/2/hi/middle\\_east/1270038.stm](http://news.bbc.co.uk/2/hi/middle_east/1270038.stm)

Benvenisti, M. (2002). *Sacred Landscape: The Buried history of the Holy Land since 1948*.

*University of California Press*. p. 2

B’tselem. (Sept, 2019). Playing the security card: Israeli Policy in Hebron as Means to Effect Forcible Transfer of Local Palestinians. *The Israeli Information Center for Human Rights in the Occupied Territories*.

[https://www.btselem.org/publications/summaries/201909\\_playing\\_the\\_security\\_card](https://www.btselem.org/publications/summaries/201909_playing_the_security_card)

Davidson, L. (2005). Christian Zionism as a Representation of American Manifest Destiny.

*Critique: Critical Middle Eastern Studies*, 14(2), 157 – 169.

Euro-Med Human Rights Monitor. (2023). Over 10,000 infants and children killed in Israel's Gaza genocide, hundreds of whom are trapped beneath debris. Euro-Med Human Rights Monitor. Dec 9<sup>th</sup>, 2023. <https://euromedmonitor.org/en/article/6020/Over-10,000-infants-and-children-killed-in-Israel's-Gaza-genocide,-hundreds-of-whom-are-trapped-beneath-debris>

Gilio-Whitaker, D. (2020). *American Settler Colonialism 101*. ThoughtCo. <https://www.thoughtco.com/american-settler-colonialism-4082454>

Ha-Am, A. (1922). Ten Essays on Zionism and Judaism. *Routledge Revivals*.

IHRA. What is antisemitism? *International Holocaust Remembrance Alliance*. <https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antisemitism>

Jackson, A. (1830). "Second Annual Message, December 6, 1830." In A Compilation of the Messages and Papers of the Presidents. *New York: Bureau of National Literature, 1897*(3), 1063–92.

Jewish Voice for Peace. On Antisemitism, Ant-Zionism, and Dangerous Conflations. *Jewish Voice for Peace*. <https://www.jewishvoiceforpeace.org/2023/11/09/antisemitism-dangerous/>

Kedourie, E. (2000). Nationalism, 4<sup>th</sup> ed. *Oxford: Blackwell*.

Marantz, A. (2016). Is Steve Bannon Good for the Jews? Alan Dershowitz attends the annual gala for a Zionist organization and considers whether the former head of Breitbart is anti-Semitic. *The New Yorker*. <https://www.newyorker.com/magazine/2016/12/12/is-steve-bannon-good-for-the-jews>

Mason, J. (1736). A Brief History of the Pequot War. *Electronic Texts in American Studies – University of Nebraska – Lincoln*.

Mordechai, B. (1914). Erinnerungen und Theodor Herzl. *Die Welt*, 692.

Mountjoy, S. (2009). *Manifest Destiny: Westward Expansion (Milestones in American History)*. Chelsea House Publications.

Ohana, D., Barell, A., & Feige, M. (2017). Nationalizing Judaism: Zionism as a Theological Ideology. *Lexington Books*.

Pappe, I. (2008). Zionism as Colonialism: A Comparative View of Diluted Colonialism in Asia and Africa. *South Atlantic Quarterly*, 107(4).

Pappe, I. (2010). The Ethnic Cleansing of Palestine. *OneWorld Publications*.

Smith, D.M. (2017). Counting the Dead: Estimating the Loss of Life in the Indigenous Holocaust, 1492 – Present. Southeastern Oklahoma State University.

Tamkin, E. (2023). Why televangelist John Hagee was a shocking March for Israel speaker: One can support Israel and also spread antisemitism. *MSNBC*.

<https://www.msnbc.com/opinion/msnbc-opinion/john-hagee-march-for-israel-antisemitism-rcna125291>

Wilsey, J.D. (2017). Our Country Is Destined to be the Great Nation of Futurity: John L. O'Sullivan's Manifest Destiny and Christian Nationalism, 1837–1846. *Religions*, 8(68), 1837 – 1846. <https://doi.org/10.3390/rel8040068>

World Food Programme. (2023). Palestine: Country Brief. The World Food Programme. <https://www.wfp.org/countries/palestine>

Wolfe, P. (2006). Settler colonialism and the elimination of the native. *Journal of Genocide Research*, 8(4), 387-409. DOI: 10.1080/14623520601056240

Wolfson, S. (2023). Antisemites supporting Israel is weird. Jewish support of them is even weirder. *The Guardian*. <https://www.theguardian.com/commentisfree/2023/nov/27/jewish-antisemitism-support-israel-gaza-zionism>

UNRWA.(2023). *Where We Work – Gaza Strip*. (2023). The United Nations Relief and Works Agency for Palestine Refugees in the Near East. <https://www.unrwa.org/where-we-work/gaza-strip>

United Nations. *Gaza “Unlivable”, Expert Tells Third Committee, as Mandate Holders Present Findings of Human Rights Situations*. United Nations Meeting Coverage and Press Releases. 24 October 2018. <https://press.un.org/en/2018/gashc4242.doc.htm>